TSD File Inventory Index

Date: July 2, 2008

Initial: CM Herrera

Facility Name: Metal Finishing Research, Inc. (One Folder Site)

Facility Identification Number: ILD 045 700 945

A.1 General Correspondence	Y	**B.2 Permit Docket (B.1.2)**	Y
A.2 Part A / Interim Status	Y	.1 Correspondence	Y
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	**C.1 Compliance - (Inspection Reports)**	Y
.3 Part A Application and Amendments	Y	**C.2 Compliance/Enforcement**	Y
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	
		5. RFI QAPP	

Table 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
7.			

Note: Transmittal Letter to Be Included with Reports.
Comments: One folder only

A.1 Public Participation

FEB 1 1982

5AHW/1

Mr. Jim Eldert
JRB Associates
1211 West 22nd Street
Oakbrook, Illinois 60521

Re: Freedom of Information Act Request
R.I 22-82

Dear Mr. Eldert:

This is in response to your letter received January 25, 1982, and your earlier conversation with Ms. April Katsura of my staff. We have sent, under separate cover, copies of the Hazardous Waste Permit Application--Part A for the eight facilities described on the enclosed list.

There is no charge for search time and duplicating because the furnished records are needed by a USEPA contractor to perform the work required under the contract.

Please contact Ms. Katsura at 886-6134, if you have any questions.

Sincerely yours,

Basil G. Constantelos
Acting Director
Waste Management Division

Enclosures

cc: Facilities on the enclosed list (8)
Illinois Environmental Protection Agency

Hazardous Waste Permit Application--Part A

1. Environmental Waste Removal, Inc.
   Broadway & Reed Road
   Coal City, IL 60416
   ILD087157251

2. Standard T Chemical Co., Inc.
   10th & Washington Street
   Chicago Heights, IL 60411
   ILT180011827

3. Standard T. Chemical Co., Inc.
   10th & Washington Street
   Chicago Heights, IL 60411
   ILD005536164

4. Allied Chemical Corp., Calumet Works
   12260 Carondolet Avenue
   Chicago, IL 60633
   ILD001833714

5. DeSoto Inc.
   300 State Street
   Chicago Heights, IL 60411
   ILD049993165

6. Searle Chemicals, Inc.
   4901 Searle Parkway
   Skokie, IL 60077
   ILD068458835

7. Metal Finishing Research Corp.
   3935 S. Lowe Ave.
   Chicago, IL 60609
   ILD000815290

8. Metal Finishing Research Corp.
   4025 S. Princeton Ave.
   Chicago, IL 60609
   ILD045700945

A.2 Part A/
Interim Status

A

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD045700945 REACKNOWLEDGEMENT

METAL FINISHING RESEARCH CORP
4025 SO PRINCETON AVE
CHICAGO IL 60609

INSTALLATION ADDRESS ➤

4025 SO PRINCETON AVE
CHICAGO IL 60609

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

Metal Finishing Research Corp.
Subsidiary of Heatbath Corp.
4025 So. Princeton Avenue
PLEASE PLACE LABEL IN THIS SPACE
000101 AUG -4 80
Chicago, Illinois 60609

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD045700945 TA 2 C 1	A	800804

I. NAME OF INSTALLATION

METAL FINISHING RESEARCH CORP.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 4025 SO. PRINCETON AVE.

CITY OR TOWN	ST.	ZIP CODE
4 CHICAGO	IL	60609

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 4025 SO. PRINCETON AVE.

CITY OR TOWN	ST.	ZIP CODE
6 CHICAGO	IL	60609

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 VADEBONCOEUR PHILIP VICE PRES.	312-373-0800

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 METAL FINISHING RESEARCH CORP.

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [X] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: ILD045700945

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 04 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	I	L	D	0	4	5	7	0	0	9	4	5	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P029	P030	P090	P053	P098	P106
37	38	39	40	41	42
U037	U122	U123	U134	U154	U222
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- ☐ 1. IGNITABLE (D001)
- ☐ 2. CORROSIVE (D002)
- ☐ 3. REACTIVE (D003)
- ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Philip L Vadeboncoeur	Philip L. Vadeboncoeur Vice President	8/1/80

DETACH

DETACH

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 100

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

1	2	3	4	5	6	7	8	9	10	11	12	13	F/A	C
F	I	L	D	0	4	5	7	0	0	9	4	5		D

LABEL ITEMS

II. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

Metal Finishing Research Corp.
Subsidiary of Heatbath Corp.
4025 So. Princeton Ave.
Chicago, Ill. 60609

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges to waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: METAL FINISHING RESEARCH CORP
Subsidiary of Heatbath Corporation

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 PHILIP L VADEBONCOEUR VICE PRES.	312 373 0800

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 4025 SO. PRINCETON AVE.			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 CHICAGO ILL.	IL	60609	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 SAME AS ABOVE			
B. COUNTY NAME			
COOK			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE (if known)**
6 CHICAGO	IL	60609	

NOV 17 1980

EPA Form 3510-1 (6-80)

NOV 20 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2899 (specify) CHEMICAL BLENDER	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: METAL FINISHING RESEARCH CORP.

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 312 373 0800

E. STREET OR P.O. BOX: 4025 S.O. PRINCETON AVE.

F. CITY OR TOWN: CHICAGO

G. STATE: IL

H. ZIP CODE: 60609

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N NONE	9 P NONE

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)	
9 U NONE	9 IL 0383001	(specify) HAULER

C. RCRA (Hazardous Wastes)	E. OTHER (specify)	
9 R NONE	9 IL0316000011	(specify) GENERATOR

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

CHEMICAL BLENDER. WE MANUFACTURE HEAT TREATING AND METAL FINISHING PRODUCTS FOR HEATBATH CORPORATION.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Philip L. Vadeboncoeur Vice President	Philip L Vadeboncoeur	11/13/80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

100

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S: F I L D 0 4 5 7 0 0 9 4 5 T/A: C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* (71)

[ ] 2. NEW FACILITY *(Complete item below.)* (71)

C 8 (15)

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
6 2 (73 74)	4 (75 76)	2 1 (77 78)

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
(73 74)	(75 76)	(77 78)

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

N.A.

[ ] 1. FACILITY HAS INTERIM STATUS (72)

[ ] 2. FACILITY HAS A RCRA PERMIT (72)

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S: C DUP T/A: C: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	(16 - 18)	(19 - 27)	(28)	(29 - 32)		(16 - 18)	(19 - 27)	(28)	(29 - 32)
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	55	G		7				
2	T 0 4	55	U		8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

This facility does process acid chrome waste at the rate of 500 gallons per day. The effluent is treated to precipitate out heavy metals and is then filtered with diatom and activated charcoal. The filtrate is recycled for reuse and the solids are packaged in drums and sent to a landfill.

The second process that is done in this facility is the effluent from alkali and cyanide blending. The cyanide is destroyed using Sodium Hypochlorite at a ph of 12.5 and an ORP of 240-330 MV. The effluent is then filtered with diatom and activated charcoal. The filtrate is recycled for reuse and the solids are packaged in drums and sent to a landfill.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.
2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): S W ILD045700945 T/A C 1

FOR OFFICIAL USE ONLY: S W DUP T/A C 2 DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P106	2000	P	S01 D80	Total Destruction
2	D001	1000	P	S01 D80	Solubleized
3	D002	6000	P	S01 D80	Neutralized
4	D005	3000	P	S01 D80	Precipitated
5	D007	6000	P	S01 D80	Precipitated & Filtered
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F | ILD045700945 | T/A | C | 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E ~~Metabolic Corporation~~ Metal Finishing Research Corp.	312 - 373 - 0800

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 4025 So. Princeton Ave.	G Chicago	IL	60609

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Philip L. Vadeboncoeur Vice President	Philip L Vadeboncoeur	11/13/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Philip L. Vadeboncoeur Vice President	Philip L Vadeboncoeur	11/13/80

Continued from page 4.

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*

100

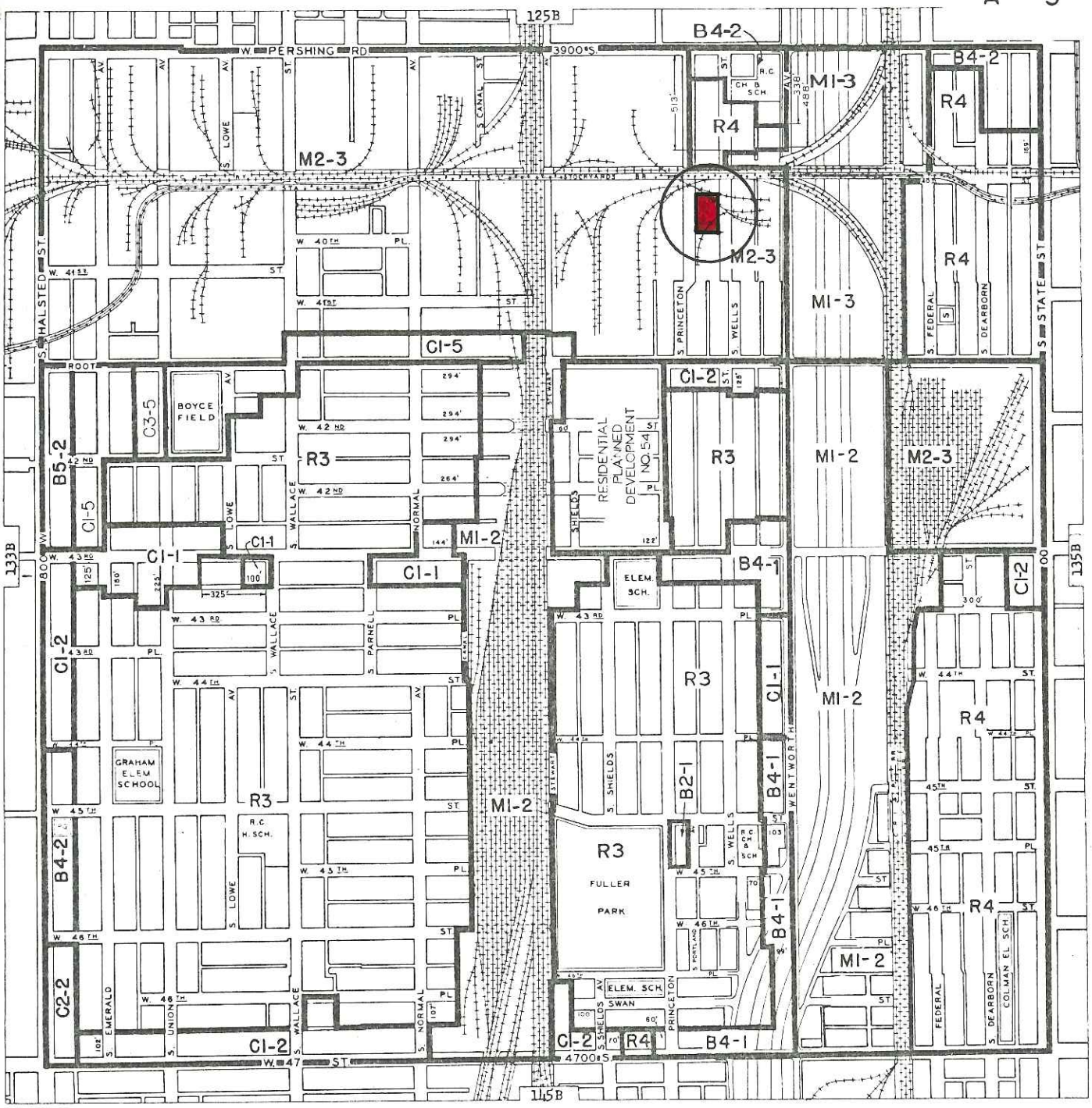
A — 1

CHICAGO and Chicagoland Industrial Areas

WALTER R. KUEHNLE & COMPANY

A — 2


2000 N.-ARMITAGE AV.
1600 N.-NORTH AV.
1200 N.-DIVISION ST.
800 N.-CHICAGO AV.
400 N.-KINZIE ST.
BASE LINE, MADISON ST.
NORTH
SOUTH
400 S.-VAN BUREN ST.
1200 S.-ROOSEVELT RD.
1600 S -16TH ST.
2200 S.-22ND ST
2600 S.-26TH ST.
3100 S.-31ST ST.
3500 S.-35TH ST.
3900 S.-PERSHING RD.
4300 S.-43RD ST.
4700 S.-47TH ST.
5100 S.-51ST ST.
5500 S.-55TH ST.
5900 S.-59TH ST.
6300 S.-63
6700 S
See Detailed Map DOWNTOWN CHICAGO
GRANT PARK
BURNHAM PARK
MEIGS FIELD H-39
McCormick Place (Exposition Center)
NAVY PIER
Tribune Tower
Chicago Historical Society
Academy of Science
CENTRAL MANFG. DISTRICT
International Amphitheatre
White Sox Park
Museum of Science and Industry
JACKSON PARK
WASHINGTON PARK
HUMBOLDT PARK
GARFIELD PARK
DOUGLAS PARK
COLUMBUS PARK
MARQUETTE PARK
Cicero
Stickney
CHICAGO SANITARY AND SHIP CANAL
Hawthorne Race Track
CHICAGO MIDWAY AIRPORT
Burbank
Hometown
Oak Lawn
Evergreen Park
Beverly
Merrionette Park
Chicago Ridge
LAKE CALUMET HARBOR
Historical Area Pullman
Chicago State Univ
Rainbow Park Beach
CALUMET RIVER



RESIDENCE DISTRICTS

R1 SINGLE-FAMILY RESIDENCE DISTRICT
R2 SINGLE-FAMILY RESIDENCE DISTRICT
R3 GENERAL RESIDENCE DISTRICT
R4 GENERAL RESIDENCE DISTRICT
R5 GENERAL RESIDENCE DISTRICT
R6 GENERAL RESIDENCE DISTRICT
R7 GENERAL RESIDENCE DISTRICT
R8 GENERAL RESIDENCE DISTRICT

BUSINESS DISTRICTS

B1-1 TO B1-5 LOCAL RETAIL DISTRICTS
B2-1 TO B2-5 RESTRICTED RETAIL DISTRICTS
B3-1 TO B3-5 GENERAL RETAIL DISTRICTS
B4-1 TO B4-5 RESTRICTED SERVICE DISTRICTS
B5-1 TO B5-5 GENERAL SERVICE DISTRICTS
B6-6 AND B6-7 RESTRICTED CENTRAL BUSINESS DISTRICTS
B7-5 TO B7-7 GENERAL CENTRAL BUSINESS DISTRICTS

COMMERCIAL DISTRICTS

C1-1 TO C1-5 RESTRICTED COMMERCIAL DISTRICTS
C2-1 TO C2-5 GENERAL COMMERCIAL DISTRICTS
C3-5 TO C3-7 COMMERCIAL-MANUFACTURING DISTRICTS
C4 MOTOR FREIGHT TERMINAL DISTRICT

MANUFACTURING DISTRICTS

M1-1 TO M1-5 RESTRICTED MANUFACTURING DISTRICTS
M2-1 TO M2-5 GENERAL MANUFACTURING DISTRICTS
M3-1 TO M3-5 HEAVY MANUFACTURING DISTRICT

NORTH

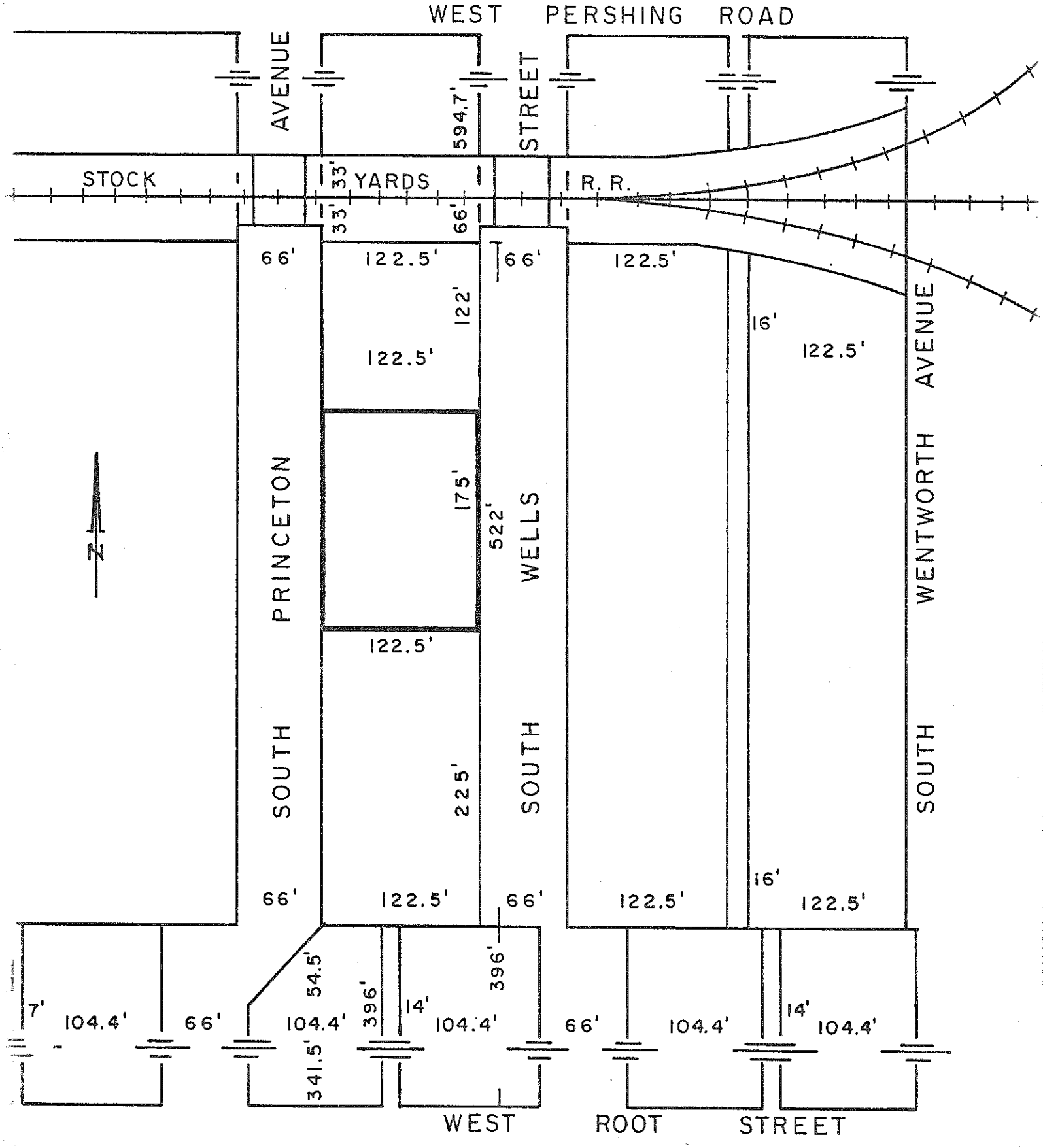
500' 250' 0 250' 500' 750' 1000'

SCALE IN FEET

FOR USE AND BULK REGULATIONS, RESIDENCE DISTRICTS, SEE ARTICLE 7.
FOR USE AND BULK REGULATIONS, BUSINESS DISTRICTS, SEE ARTICLE 8.
FOR USE AND BULK REGULATIONS, COMMERCIAL DISTRICTS, SEE ARTICLE 9.
FOR USE AND BULK REGULATIONS, MANUFACTURING DISTRICTS, SEE ARTICLE 10

A — 4 — a

SKETCH OF PROPERTY
4025 SOUTH PRINCETON AVENUE
CHICAGO, ILL.



WALTER R. KUEHNLE & COMPANY

A – 4 – b 100

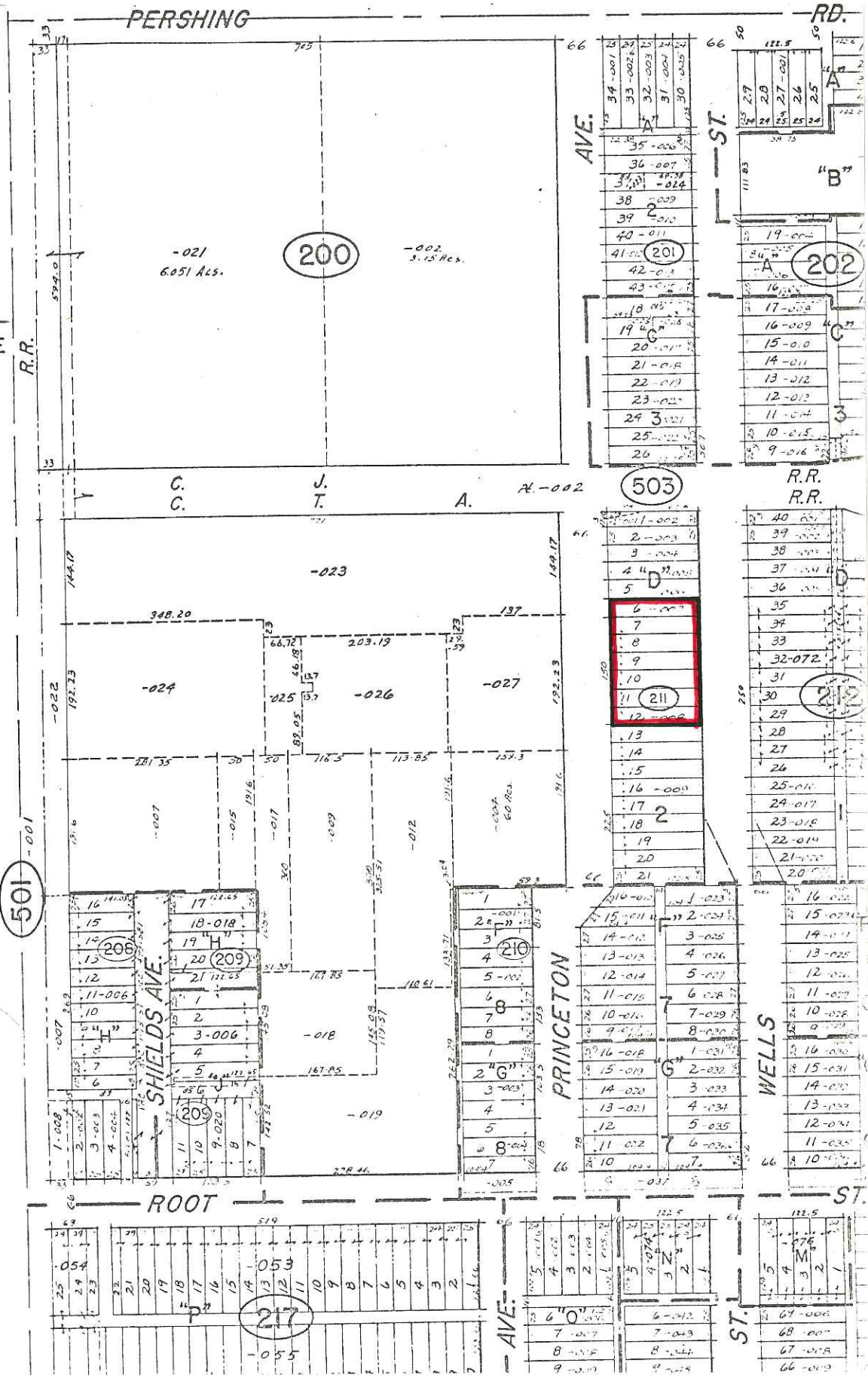
38-14-4A
20-4

W. ½ N.E. ¼ Sec. 4 - 38 - 14
LAKE TWP.

"D"
THE AMERICAN BRIDGE CO.'S SUB. of that part of Blk. 3 lying S. of the Union Stock Yards R.R. and of Blk. 6 of Pryor's Sub. of part of the N.E. 1/4 of Sec. 4-38-14. Rec. Oct. 2, 1873. Doc. 128821.

PERMANENT REAL ESTATE INDEX NUMBERS

20 – 04 – 211 – 007
20 – 04 – 211 – 008



VIEWS OF SUBJECT PROPERTY

100

PRINCETON AVENUE FRONTAGE
WEST ELEVATION LOOKING NORTH

WELLS STREET FRONTAGE
EAST ELEVATION LOOKING NORTH

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL [illegible]

217/782-6762

Refer to: 0316340003 -- Cook County
Metal Finishing Research Corporation
ILD045700945
RCRA Permit

June 20, 1989

Heatbath Corporation
Attn: E. A. Walen
Post Office Box 2978
Springfield, Massachusetts 01102-2978

Dear Mr. Walen:

This is in response to the Part A withdrawal request which you submitted on September 28, 1988 for the Metal Finishing Research Corporation facility located at 4025 South Princeton Avenue, Chicago, Illinois 60609. (State ID No. = 0316340003, USEPA ID No. = ILD045700945). Based upon a review of this request (as supplemented by additional information which you submitted under a cover letter dated June 2, 1988) and the files at IEPA pertaining to the above-referenced facility, the Agency must deny your request to withdraw Part A of the RCRA permit application for the subject facility. This decision is based upon the fact that (1) the manifests submitted indicate hazardous waste was stored on-site for more than 90 days several times during the time period from 1982 to the present and (2) Facility Annual Reports were submitted from 1982 to 1987 which indicate that hazardous wastes were being stored on-site for time periods longer than 90 days (the 1988 Annual Report was not available for review).

Due to the fact that the Part A withdrawal request which you submitted has been denied, the Metal Finishing Research Corporation facility located at 4025 South Princeton Avenue, Chicago, Illinois 60609 remains subject to the requirements of 35 IAC Part 725. Please note that according to 35 IAC 703.157(f), interim status for this facility will terminate on November 8, 1992, since Part B of the RCRA permit application was not submitted for this facility by November 8, 1988. Therefore, you must initiate closure of the hazardous waste container storage area at the above-reference facility prior to November 8, 1992. To achieve this requirement, you must submit a closure plan which meets the requirements of 35 IAC 725.Subpart G to IEPA, DLPC by May 8, 1992 for review and approval. A copy of a guidance document which IEPA has developed for RCRA closure plans is enclosed for your convenience.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357
ADM 38
254-002

Subject Log No.

Data Review Notes (1)

Reviewed by JKM Date 6/10/89

(1) we received a Part A w/d for the Metal Finishing Research Corp facility in Chicago, IL (State ID No. 0316340003, Fed ID No. ILD045700965 on 9/30/88
- was submitted under a cover letter dated 9/28/88 from E.A. Wale President, Heatbath Corp, in response to our Part B call-in letter

(2) The Part A w/d request was submitted in a EPA form entitled "Part A Withdrawal Request Form" (IL 532-1489, LPC 233 8/86)
- indicated that TO4 (waste water treatment tanks) and SO1 (storage in containers) units are present @ facility
- reasons indicated why Part A should be w/d
  (1) elementary neutralization & ww treatment unit (TO4)
  (2) protective filer
  (3) ww treatment unit (TO4)

however, no information was provided to support the claim that the facility should have its Part A withdrawn, although it is specifically requested on the form
→ "INCLUDE COPIES OF ANY SUPPORTIVE DOCUMENTS... TO SUBSTANTIATE NON-REGULATED CLAIM."
→ "* COMMENT SECTION SHOULD BE USED TO EXPLAIN IN DETAIL THE REASON FOR CLAIMING NON-REGULATED STATUS."

(3) because insufficient info was provided, I called Mr. Walen and asked for additional info
→ he proposed sending copies of the manifests which were completed for the waste being sent off-site

(4) we received the copies of the manifests on 6/8/89
- they were submitted under a cover letter dated 6/2/89 from Mr. Walen

OF THE 35 SHIPMENTS OF WASTE IDENTIFIED BY THESE MANIFESTS, 11 OF THEM OCCURRED MORE THAN 90 DAYS DAYS AFTER THE PREVIOUS SHIPMENT OF WASTE WAS SENT OFF-SITE

Plant

FACILITY PART A WITHDRAWAL REQUEST FORM

Date: 9 /28 /88

Facility Name: Metal Finishing Research Corp.
(As it appears on the Federal Printout or on the accepted Part A)

Federal ID Number: I L D 0 4 5 7 0 0 9 4 5

State ID Number: 0 3 1 6 3 4 0 0 0 3

Location of Facility: 4025 S. Princeton Avenue
(Street Address)

Chicago, IL (City) 60609 (Zip Code) Cook (County)

Contact Person & Phone #: Ernest A. Walen-President (413) 543 -3381
(Name and Title)

A representative of our facility previously submitted a Part A RCRA Interim Status Permit Application indicating the handling of hazardous waste by the following process(es):

Treatment		Storage		Disposal	
Tank	T01 ___	Container (barrel, drum, etc.)	S01 X	Injection Well	D79 ___
Surface Impoundment	T02 ___	Tank	S02 ___	Landfill	D80 ___
Incineration	T03 ___	Waste Pile	S03 ___	Land Application	D81 ___
*Other (Specify Below)	T04 X	Surface Impoundment	S04 ___	Ocean Disposal	D82 ___
				Surface Impoundment	D83 ___

* Waste Water Treatment Tanks

The Part A was filed in error for the following reason(s):

		COMMENTS*
___	A. Asbestos	
___	B. Drum Recycling	
___	C. Elementary Neutralization**	
X	D. Elementary Neutralization and Wastewater Treatment Unit**	Chemical blending operation - see attached letter for more detail
___	E. Exempted Waste	
___	F. Non-Hazardous Waste	
___	G. Pickle Liquor***	
X	H. Protective Filer	Thought we came under regulations
___	J. Raw Materials	
___	K. Recycling (Specify type of recycling, and exemption claimed)	
___	M. Small Quantity Generator	
___	N. Storage less than 90 days	
___	P. Transfer Facility	
___	Q. Transporter	
X	R. Wastewater Treatment Unit**	Blender of metal finishing and treati products
___	S. Non-Existing Facility (Never Built)	
___	T. Other	

Include copies of any supportive documents (i.e., waste analysis, manifests, amended Part A's, etc.) to substantiate non-regulated claim.

* Comment Section should be used to explain in detail the reason for claiming non-regulated status. If more than one reason is checked, each comment should reflect the alpha letter next to each explanation.

** Whenever a Treatment Exemption is claimed, the Comment Section should indicate what process generated the waste (i.e., plating operation, metal heat treating, etc.).

*** Other than spent pickle liquor generated by steel finishing operations of plants that produce iron and/or steel.

Based on the above information (check one):

___ 1. Please withdraw the RCRA Part A Permit Application as our facility never treated, stored (more than 90 days) or disposed of hazardous waste since November 19, 1980 and is currently not regulated.

___ 2. Please withdraw the RCRA Part A Permit Application as our facility is exempt from regulation.

_X_ 3. # Please withdraw the RCRA Part A Permit Application and change the regulated status to:

_X_ a. Generator

___ b. Transporter

(If number 3 is checked, a new or subsequent 8700-12 (EPA Hazardous Waste Notification) may be required).

I am aware that should our facility transport, generate, treat, store or dispose (i.e.,transport, generate, treat, store or dispose of) any hazardous waste in the future, we would be required to comply with the notification and/or permitting (i.e., notification and/or permitting) requirements of RCRA.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Ernest A. Olsen President 9/28/88

+(Name and Title - Date)

+ (Signature must be in compliance with 702.126 (i.e., responsible corporate officer or designee, general partner or the proprietor, principal executive officer of an agency, etc.)

BB:tk:3/1/42(8/5/86)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

APR 16 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Philip L. Vadeboncoeur, Vice President
Metal Finishing Research Corporation
4025 South Princeton Avenue
Chicago, Illinois 60609

RE: Interim Status Acknowledgement USEPA ID No. ILD 045 700 945
FACILITY NAME: METAL FINISHING RESEARCH CORPORATION

Dear Mr. Vadeboncoeur:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

AK 4/16/82

B. Permit Application /Post Permit

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 0316340003 -- Cook County
Metal Finishing Research
ILD045700945
RCRA - Permits

May 6, 1988

Metal Finishing Research
4025 South Princeton Avenue
Chicago, Illinois 60609

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:rd1313j/1314j

Enclosures

cc: Division File
Compliance
Maywood Region
USEPA Region V

C.2 Compliance/ Enforcement

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: January 4, 1993

SUBJECT: Metal Finishing Research
ILD045700945
4025 S. Princeton, Chicago

FROM: George J. Hamper

TO: Francene D. Harris

The facility was inspected in 1986 and the inspector observed that the facility was currently shipping waste off-site every 90 days. So, after the 1986 inspection, the State suggested that the facility should submit a withdrawl request. In 1988, two years later, the company submitted the withdrawl request. But on June 20, 1989, after reviewing the withdrawl request as well as manifests and annual reports, the State determined that the facility had stored waste for more than 90 days on at least 11 occasions between 1982 and 1987. The letter advised the facility that it must go through RCRA closure before it can convert to generator status. The closure plan was submitted on August 19, 1991, but has not been approved. *In addition, this plant may have received waste from off-site (3935 S. Lowe) from Nov 1980 to June 1983.* The file contains three internal State memos dated August 21, 1989, May 23, 1991, and June 10, 1991 that appear to contradict the June 20, 1989 official letter. However, these memos do not mention the June 20, 1989 letter, which leads me do believe that the authors were unaware of it. Furthermore, since these three memos provide no specific details about the facility's operation from 1982 to 1987, I suspect that that they were not based than on a thorough review of the facility's operation during that period. *Perhaps the State confused this facility with the company's other facility at 3935 S. Lowe, Chicago IL.*

I was unable to find any additional information. Based on the information that you provided to me, I think that this is a regulated facility that is subject to our corrective action authority under Section 3008(h) of RCRA. I think that the PA/VSI should be completed.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: December 15, 1992

SUBJECT: Protective Filers

FROM: Francene D. Harris FDHarris
MN/OH Technical Enforcement Section

TO: George Hamper, Chief
IL Permitting Section

Attached is file information on the following facilities:

1. GNB Batteries, Inc. - ILD 005 215 256
2. Metal Finishing Research Corp. - ILD 045 700 945

Could someone from your section review the information and make a determination if the facilities are protective filers. Please return this information to me by COB December 28, 1992. Thank you for your cooperation. If you have any questions, please contact me at 6-2884.

Attachments

cc: Kevin Pierard

PRC

Interoffice Correspondence

Date: December 9, 1992

To: Shin Ahn

From: Ken Valder KV

Subject: PA/VSI Facility that May be a Protective Filer

Facility: Metal Finishing Research Corp. (Princeton Ave. facility)
EPA ID No.: ILD 045 700 945
PRC ID No.: 009-C05087IL7S

File reviews for the subject facility have revealed that the facility may be a protective filer. Enclosed are documents that reflect this preliminary conclusion.

Please notify me of EPA's decision as to whether or not PRC will perform the PA/VSI at the subject facility. The Milwaukee office has temporarily stopped working on this project until a decision is made.

Notes: The enclosed documents indicate that the facility is exempt from regulation as a TSD. The Illinois Environmental Protection Agency (IEPA) apparently made a ruling on this facility in a June 10, 1991, memorandum to the facility file.

Attachment:

1. IEPA, 1989. Memorandum from Gary King to Distribution, October 6.
2. IEPA, 1989. Site Narrative for Metal Finishing Research Corp. (MFRC), July 27.
3. IEPA, 1991. Memorandum from Brian White to File, June 10.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: June 10, 1991

): Division File

FROM: Brian White BW

SUBJECT: 031634003 -- Cook County
Metal Finishing Research Corporation
ILD045700945
Compliance File

On September 29, 1989 EDG determined that this site was not regulated as a treatment or storage facility. This determination was based on an August 21, 1989 memo from Chuck Mikalian, an attorney with the Agency's Division of Legal Counsel, and the July 27, 1989 inspection by Mary Glynn. Therefore, the violations of Sections 725.243 and 725.245 as cited in the September 11, 1985 Pre-Enforcement Letter and Sections 725.242(b), 725.243(a)(2), 725.243(c)(4), 725.243(c)(5), 725.243(c)(7), 725.243, 725.247(a), and 724.251 as cited in the April 25, 1989 Compliance Inquiry Letter are now considered resolved.

BW:LS

cc: Maywood Region
Andy Vollmer
Lizz Schwartzkopf

Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

MEMORANDUM

DATE: October 6, 1989

TO: Distribution

FROM: Gary King, Senior Attorney DLPC Gary King

SUBJECT: Results of Enforcement Decision Group Meeting of September 29, 1989

On September 29, 1989, the Enforcement Decision Group met and made the following determinations with respect to the following sites. In attendance were Harry Chappel, Glen Savage, Angela Tin, Larry Eastep and myself. The next meeting is scheduled for Friday, October 27, 1989.

1. G E Plastics (Borg Warner) (0990800016) - EDG determined that a PECL (rather than a CIL) should be sent to G E for the plan and cost estimate deficiencies.

2. Atkinson Grain & Fertilizer, Inc. (0730000000) - EDG determined that this site should be sent to RPMS to coordinate a removal action. Hortense Haynes is the assigned attorney.

3. C. L. Industries, Inc. (1838060003) - EDG determined that a ENL (with 31(d) language) should be sent and the case referred to the AGO. Gregg Richardson is the assigned attorney.

4. Hoopeston/Tweedy (1838070002) - EDG determined that further enforcement as to the May 5, 1989 CIL should be withheld.

5. Northwestern Steel & Wire (195050007) - EDG determined that a referral update should be sent to Region V for the continuing violation of Sec. 703.121(b). Paul Jagiello is the assigned attorney.

6. Mortell Company (0910550009) - EDG determined that further enforcement action should be withheld based on the compliance schedule imposed by FOS.

7. Midland Machine (1150150053) - EDG determined that this site should be referred to RPMS to initiate an immediate removal and that enforcement action should be referred to the AGO to seek a preliminary injunction to cease operations at the facility. Gregg Richardson is the assigned attorney.

8. Environmental Reclamation Co. (0928050007) - EDG determined that an ENL (w/o 31(d) language) should be sent and the case referred to the AGO. Mark Gurnik is the assigned attorney.

10. Metal Finishing Research Corp. (031634003) - EDG determined that enforcement activity should be withheld since the site is not subject to regulation as a TSD facility.

11. Celotex Corp. (0316310002) - FOS should coordinate with RPMS to determine what impact site activities are having on the RI and report back to EDG.

7/27/89
0316340003

NARRATIVE

Metal Finishing Research Corporation manufactures raw materials for use by metal finishing and treating industries. Liquid chemicals (acids) and dry chemicals (alkalines) are blended in two separate areas. Wastewater is generated when process equipment is washed. It is then piped into separate floor drains (one for acids and one for alkalines) that empty into separate treatment tanks in the wastewater treatment area. Alkaline wastewater is treated with sodium hypochlorite for cyanide destruction and then neutralized to a pH of 8.5. Acid waste water is treated for reduction of chrome, precipitation of heavy metals and neutralized to a pH of 8.5. Filtrate from this process is either reused in the process or discharged to MSD.

Hazardous Waste Generated

Heavy Metal Sludge (D007)
- Collected in 55 gal drums from the wastewater treatment system.
- Generates approximately 2 drums per week.
- Shipped within 90 days to CID in Calumet City, IL for landfilling.
- 16 drums were on site.

Hazardous Waste Areas

Hazardous Waste Accumulation Area
- Located in the southeastern corner of the plant in the warehouse area.
- A concrete area with 16 drums of waste stored on wooden pallets (2 high).
- The waste occupied an area of approximately 10 ft x 5 ft.

Additional Notes

In 1980 this facility submitted a Part A for treatment and storage of hazardous waste. However, the treatment system appears to be exempt because it meets the definition of a wastewater treatment unit in 720.110. Also, evidence obtained from reviewing manifests, etc.... support the fact that the company has never stored hazardous waste. Thus, they should be regulated as a generator and their Part A should be withdrawn.

In 1987, an ENL was sent for violations of 725.243 and 725.247. According to Chuck Mikalian of Enforcement, action on the case has been delayed due to uncertainty in the facility's regulated status (i.e., G or G,TSD). If they withdraw their Part A, they would no longer be subject to the provisions of 725.243 and 725.247.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: June 10, 1991

TO: Division File

FROM: Brian White BW

SUBJECT: 031634003 -- Cook County
Metal Finishing Research Corporation
ILD045700945
Compliance File

On September 29, 1989 EDG determined that this site was not regulated as a treatment or storage facility. This determination was based on an August 21, 1989 memo from Chuck Mikalian, an attorney with the Agency's Division of Legal Counsel, and the July 27, 1989 inspection by Mary Glynn. Therefore, the violations of Sections 725.243 and 725.245 as cited in the September 11, 1985 Pre-Enforcement Letter and Sections 725.242(b), 725.243(a)(2), 725.243(c)(4), 725.243(c)(5), 725.243(c)(7), 725.243, 725.247(a), and 724.251 as cited in the April 25, 1989 Compliance Inquiry Letter are now considered resolved.

BW:LS

cc: Maywood Region
Andy Vollmer
Lizz Schwartzkopf

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: August 21, 1989

Gary King - EDG

FROM: Chuck Mikalian CM

Regulate as generator

SUBJECT: 031634003/Cook County
Metal Finishing Research Corporation
ILD045700945
Compliance

The purpose of this memo is to request whether enforcement action is still appropriate at this site.

On November 23, 1987, EDG instructed this author to refer this facility to the USEPA for Subpart H violations. By memo dated December 15, 1987, I requested further guidance from EDG, noting that the site is apparently not regulated. EDG ordered enforcement to be withheld pending clarification of the site's regulatory status.

FOS reinspected this site last month (copy of inspection narrative attached). The inspection indicates that the site's treatment system is a wastewater treatment system under 35 Ill. Adm. Code 720.110. Also, no evidence indicates that the site has ever stored hazardous. For these reasons, the site apparently is not regulated as a TSD facility.

The site has filed a Part A. Please advise whether enforcement should proceed.

GK:kh/13-3

MEMORANDU

DATE: May 23, 1991

TO: EDG

FROM: Andy Vollmer

SUBJECT: Update: Metal Finishing Research - 0316340003
ILD045700945, Financial Assurance Violations

This site is being returned to EDG for a decision on the status of the facility. Company request to withdraw Part A (and thus not be regulated as a facility) was denied by Permit Section on June 20, 1989. A subsequent FOS inspection, on July 27, 1989, indicated that the facility was not subject to regulation as a facility.

Also, on Aug. 21, 1989, EDG was requested to determine if enforcement for financial assurance violations should proceed. During the EDG meeting of Sep. 29, 1989, this matter was considered and a decision was made that "enforcement should be withheld since the site is not subject to regulation as a TSD facility" (EDG memo of Oct. 6, 1989).

Because the files may show an apparent inconsistency in the status of this facility, a request is made for EDG to reconsider this matter and to provide guidance.

AV:EPT:ngk15

Do Not Send!
as a result of a meeting
by RAD, EPT & RW, it was
established that the previous action
on EDG that this operation is
NOT a facility but a
generator, both violations
became moot and the
violations are
deemed to
be resolved
EPT
5/29/

IL 532-0570
EPA-90 (Rev. 6/75-20M)

7/27/89
0316340003

NARRATIVE

Metal Finishing Research Corporation manufactures raw materials for use by metal finishing and treating industries. Liquid chemicals (acids) and dry chemicals (alkalines) are blended in two separate areas. Wastewater is generated when process equipment is washed. It is then piped into separate floor drains (one for acids and one for alkalines) that empty into separate treatment tanks in the wastewater treatment area. Alkaline wastewater is treated with sodium hypochlorite for cyanide destruction and then neutralized to a pH of 8.5. Acid waste water is treated for reduction of chrome, precipitation of heavy metals and neutralized to a pH of 8.5. Filtrate from this process is either reused in the process or discharged to MSD.

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Hazardous Waste Accumulation Area
- Located in the southeastern corner of the plant in the warehouse area.
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- The waste occupied an area of approximately 10 ft x 5 ft.

Additional Notes

In 1980 this facility submitted a Part A for treatment and storage of hazardous waste. However, the treatment system appears to be exempt because it meets the definition of a wastewater treatment unit in 720-110. Also, evidence obtained from reviewing manifests, etc.... support the fact that the company has never stored hazardous waste. Thus, they should be regulated as a generator and their Part A should be withdrawn.

In 1987, an ENL was sent for violations of 725.243 and 725.247. According to Chuck Mikalian of Enforcement, action on the case has been delayed due to uncertainty in the facility's regulated status (i.e., G or G,TSD). If they withdraw their Part A, they would no longer be subject to the provisions of 725.243 and 725.247.

RECEIVED
AUG 21 1989
IEPA-DLPC

RECEIVED
AUG 11 1989
IEPA-DLPC

ILLINOIS Environmental Protection Agency
1701 First Avenue, Maywood, IL. 60153

312/345-9780

CERTIFIED MAIL
Return Receipt
#P 060 650 099

Refer to: 031634 0003 ~~031600011~~ - Cook County - Metal Finishing Research Corporation
ILD045700945
FOS

November 10, 1986

Metal Finishing Research Corporation
4025 South Princeton
Chicago, Illinois 60609

Dear Mr. Baldys:

An inspection of the above facility was conducted by Rich Finley of the Illinois Environmental Protection Agency on October 22, 1986. The purpose of this inspection was to determine your facility's compliance with the Illinois Environmental Protection Act and Rules and Regulations set forth by the Illinois Pollution Control Board. Based on the information obtained during the inspection, we have determined that your facility is apparently not regulated under 35 Ill. Adm. Code, Part 725.

Therefore, since it appears your facility is presently not regulated under 35 Ill. Adm. Code 725, you should request in writing within 30 days of the date of this letter to amend your EPA Notification Form 8700-12 to reflect generator only status. With your request to amend your EPA Notification, you must include the following certification signed by a responsible corporate office:

> "I certify under penalty of law that this document and all attachments were prepared under my direction of supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations".

RCRA INSPECTION REPORT
FORM B - Generator Inspection*

General Information* 03/6340003

USEPA Number: ILD045100945 IEPA Number: ~~0311600011~~

Major Facility: YES/NO Notified As: GEN/STORAGE Regulated As: GENERATOR

(A) Facility Name: METAL FINISHING RESEARCH CORP

(B) Street: 4025 S. PRINCETON

(C) City: CHICAGO (D) State: IL (E) Zip Code: 60609

(F) Phone: 373-0800 (G) County: COOK

Region: 2 (H) Date of Inspection: 10/22/86 Time: (From) 9:50 AM (TO) 10:40 AM

Type of Inspection: (ISS) RECORD REVIEW SAMPLING CITIZEN COMPLAINT OTHER

F/U ___/___/___ (Date of Initial Inspection

(I) Weather Conditions: DRY; 70°F

Area	Section	Class I	Class II
OTH	722.134(a)	✓	
TOTAL Class I's & II's		1	

	Person(s) Interviewed	Title	Telephone
(J)	JOHN M. BALDYS	PLANT MGR	373-0800

	Inspection Participants	Agency/Title	Telephone
(K)	RICH FINLEY	IEPA/EPS	345-9780

	Preparer Information	Agency/Title	Telephone
(L)	Name: R. FINLEY	IEPA/EPS	345-9780

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

RECEIVED
NOV 13 1986
IEPA-DLPC

IL 532-1341
LPC 192 4/85

DEC 10 '92 11:44AM PRC-EMI MILWAUKEE 4148215946 (1) (8) (9) ILD045700947 P.17/17

OBSERVATION REPORT - SITE INVENTORY NO. 031634037 (11) (18)

Cook CO. - L.P.C. Region # N Date 06/02/82 (20) (25)

Chicago (Location) / Metal Finishing (Responsible Party) Letter Sent (Yes or No) N (26)

Samples Taken: Yes ( ) No (X) Time: From 02:00 pm Weather 70°
Ground Water( ) Surface( ) Other( ) To 04:30 pm
Photos Taken: Yes ( ) No (X) Interviewed Phil Vadeboncoeur Inspector B (27) P B (29)

Previous Inspection — Previous Correspondence — Site Open: Yes (X) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	(X)	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other Treatment	(X)	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)	1 (30)			Board Order	( )
						Illegal (5)	( ) N/A (31)

IMPROVED

(SAME)

LPC 4 1/79 5,000

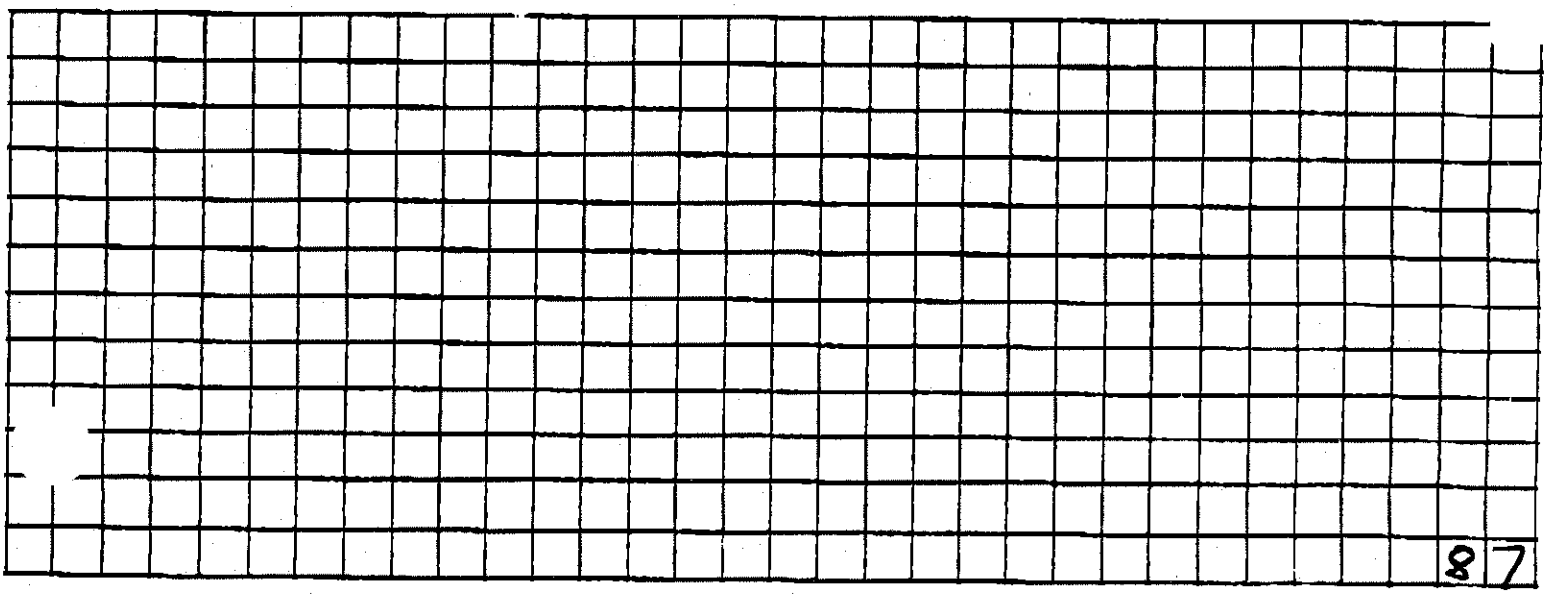
DETERIORATED

I S or D S (62)

GENERAL REMARKS: Facility would be considered a generator and Treatment site under RCRA. Although the sludge is non-hazardous by analysis, they must get it delisted since the sludge generated by treating a hazardous waste is hazardous. The sludge is kept at the plant ~ one week and then transported to their warehouse at 3935 Howe Ave for storage. A part A applic. has also been submitted for this facility.

INTERVIEW: Facility has valid permits to CID and ESL for the disposal of Chrome sludge. The also use a licensed hauler (# 0383) and transport their own waste. RCRA deficiencies included:
1) Waste analysis plan
2) Gen. Inspection Reg.
3) Training Program
4) Closure Plan - estimate

DIAGRAM:



87

NARRATIVE

SITE ACTIVITY: THIS FACILITY IS A BLENDER OF RAW CHEMICALS FOR SALE TO THE METAL TREATING AND METAL FININISHING INDUSTRY. THE FACILITY BLENDS BOTH LIQUIDS (ACIDS) AND DRY CHEMICALS (ALKALINE) IN TANKS.

WASTE IS GENERATED WHEN TANKS ARE WASHED, AND FROM AIR POLLUTION EQUIPMENT. WASHINGS FROM LIQUID AND DRY CHEMICALS GO INTO SEPARATE SEWER SYSTEMS WHICH LEADS TO A WASTE TREATMENT SYSTEM. THE DRY CHEMICALS WHICH CONSISTS OF ALKALINES AND SOME CYANIDES ON OCCASION ARE TREATED FOR CYANIDE DESTRUCTION AND NEUTRALIZATION OF THE ALKALINES. THE ACIDS STREAM IS TREATED FOR REDUCTION OF HEXAVALENT CHROME TO TRIVALENT CHROME AND THEN NEUTRALIZED. WASTE IS THEN PUMPED INTO A HOLDING TANK WHICH HOLDS ALL WASTES IN THE FACILITY. THE WASTE IS THEN FILTERED. EFFLUENT WATER IS REUSED FOR PRODUCT AND DRUM WASHINGS. (NO WASTEWATER TO MSD) A CHROMIUM SLUDGE IS REMOVED FROM FILTER PRESS BY HAND, CONTAINERIZED, AND MANIFESTED TO CID FOR LANDFILLING.

AT TIME OF INSPECTION THE FACILITY WAS IN APPARENT VIOLATION OF 35 IL. ADM CODE 722.134(a), AS PERSONNEL TRAINING RECORDS WERE NOT AVAILABLE FOR INSPECTION.

FACILITY DOES NOT ALLOW WASTES TO REMAIN ON SITE FOR MORE THAN 90 DAYS AND THEREFORE IS NOT SUBJECT TO REGULATIONS AS A STORAGE FACILITY.

mm

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: 0316340003 -- Cook County
Metal Finishing Research Corporation
ILD045700945
Compliance File

COMPLIANCE INQUIRY LETTER

Certified # P131 301 513

April 25, 1989

Heatbath Corporation
Attn: E.A. Walen
107 Front Street
Indian Orchard, MA 01151

Dear Mr. Walen:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Part 725 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance in Attachment A are based on a April 12, 1989 review of documents submitted to the Agency to demonstrate compliance with the requirements of Subpart H.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Enclosed are the standardized financial assurance forms which must be used.

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

If you have any questions regarding the above, please contact Brian White.

Sincerely,

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:BW:bjh/1553k/13,14

Enclosures

cc: Division File
Maywood Region
Mary Murphy, USEPA
Andrew Vollmer
Brian White

Attachment A

1. Pursuant to 35 Ill. Adm. Code 725.242(b), during the active life of the facility, the owner or operator shall adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instruments used to comply with Section 725.243. For owners and operators using the financial test or corporate guarantee, the closure cost estimate must be updated for inflation within 30 days after the close of the firm's fiscal year and before submission of updated information to the Agency as specified in Section 725.243(e)(5). The adjustment may be made by recalculating the closure cost estimate in current dollars, or by using an inflation factor derived from the most recent annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its Survey of Current Business as specified in subsections (b)(1) and (b)(2). The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year.

   1. The first adjustment is made by multiplying the closure cost estimate by the inflation factor. The result is the adjusted closure cost estimate.

   2. Subsequent adjustments are made by multiplying the latest adjusted closure cost estimate by the latest inflation factor.

   You are in apparent violation of 35 Ill. Adm. Code 725.242(b) for the following reason(s): You have not updated your closure costs for the years 1986, 1987, and 1988.

2. Pursuant to 35 Ill. Adm. Code 725.243(a)(2), the wording of the trust agreement must be as specified in 35 Ill. Adm. Code 724.251 and the trust agreement must be accompanied by a formal certification of acknowledgment as specified in 35 Ill. Adm. Code 724.251. Schedule A of the trust agreement must be updated within 60 days after a change in the amount of the current closure cost estimate covered by the agreement.

   You are in apparent violation of 35 Ill. Adm. Code 725.243(a)(2) for the following reason(s):

   1. You submitted a photocopy of the trust agreement; therefore, the Agency has rejected it.

   2. The certification at the back of the trust agreement has not been completed as required.

3. Pursuant to 35 Ill. Adm. Code 725.243(c)(4), the letter of credit must be accompanied by a letter from the owner or operator referring to the letter of credit by number, issuing institution, and date and providing the following information: The EPA Identification Number, name and address of the facility, and the amount of funds assured for closure of the facility by the letter of credit.

You are in apparent violation of 35 Ill. Adm. Code 725.243(c)(4) for the following reason(s): You failed to submit a cover letter with the required information.

4. Pursuant to 35 Ill. Adm. Code 725.243(c)(5), the letter of credit must be irrevocable and issued for a period of at least 1 year. The letter of credit must provide that the expiration date will be automatically extended for a period of at least 1 year unless, at least 120 days before the current expiration date, the issuing institution notifies both the owner or operator and the Agency by certified mail of a decision not to extend the expiration date. Under the terms of the letter of credit, the 120 days will begin on the date when both the owner or operator and the Agency have received the notice, as evidenced by the return receipts.

   You are in apparent violation of 35 Ill. Adm. Code 725.243(c)(5) for the following reason(s): You submitted a photocopy of the letter of credit; therefore, the Agency has rejected it.

5. Pursuant to 35 Ill. Adm. Code 725.243(c)(7), whenever the current closure cost estimate increases to an amount greater than the amount of the credit, the owner or operator, within 60 days after the increase, shall either cause the amount of the credit to be increased so that it at least equals the current closure cost estimate and submit evidence of such increase to the Agency, or obtain other financial assurance as specified in this Section to cover the increase. Whenever the current closure cost estimate decreases, the amount of the credit may be reduced to the amount of the current closure cost estimate following written approval by the Agency.

   You are in apparent violation of 35 Ill. Adm. Code 725.243(c)(7) for the following reason(s): You failed to submit a letter of credit for the increases in the cost estimates for the years 1986, 1987, and 1988.

6. Pursuant to 35 Ill. Adm. Code 725.243, an owner or operator of each facility shall establish financial assurance for closure of the facility. The owner or operator shall choose from the options as specified in subsections (a) through (e).

   You are in apparent violation of 35 Ill. Adm. Code 725.243 for the following reason(s): You failed to provide adequate financial assurance. In your letter from the chief financial officer for the year 1989, your facility did not demonstrate a tangible net worth of at least $10 million; therefore, you cannot use the financial test or corporate guarantee. In accordance with 35 Ill. Adm. Code 725.243(e)(7), the owner or operator shall provide alternate financial assurance within 30 days of this notification.

Note: Pursuant to 35 Ill. Adm. Code 725.243(e)(1), an owner or operator may satisfy the requirements of this Section by demonstrating that the owner or operator passes a financial test as specified in this paragraph. To pass this test the owner or operator shall meet the criteria of either subsection (e)(1)(A) or (e)(1)(B):

A. The owner or operator shall have:

i. Two of the following three ratios: a ratio of total liabilities to net worth less than 2.0; a ratio of the sum of net income plus depreciation, depletion and amortization to total liabilities greater than 0.1; and a ratio of current assets to current liabilities greater than 1.5; and

ii. Net working capital and tangible net worth each at least six times the sum of the current closure and post-closure cost estimates and the current plugging and abandonment cost estimates; and

iii. Tangible net worth of at least $10 million; and

iv. Assets located in the United States amounting to at least 90 percent of total assets or at least six times the sum of the current closure and post-closure cost estimates and the current plugging and abandonment cost estimates.

B. The owner or operator shall have;

i. A current rating for its most recent bond issuance of AAA, AA, A or BBB as issued by Standard and Poor's or Aaa, Aa, A or Baa as issued by Moody's; and

ii. Tangible net worth at least six times the sum of the current closure and post-closure cost estimates and the current plugging and abandonment cost estimates; and

ii. Tangible net worth of at least $10 million; and

iv. Assets located in the United States amounting to at least 90 percent of total assets or at least six times the sum of the current closure and post-closure cost estimates and the current plugging and abandonment cost estimates.

And pursuant to 35 Ill. Adm. Code 725.243(e)(10), an owner or operator may meet the requirements of this Section by obtaining a written guarantee, hereafter referred to as "corporate guarantee." The guarantor shall be the parent corporation of the owner or operator. The guarantor shall meet the requirements for owners or operators in subsections (e)(1) through (e)(8).

7. Pursuant to 35 Ill. Adm. Code 725.247(a), an owner or operator of a hazardous waste treatment, storage or disposal facility, or a group of such facilities, shall demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities. The owner or operator shall have and maintain liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs. This liability coverage may be demonstrated in one of three ways, as specified in subsections (a)(1), (a)(2) and (a)(3).

   You are in apparent violation of 35 Ill. Adm. Code 725.247(a) for the following reason(s): You failed to provide liability coverage. If you cannot obtain insurance coverage, then you must obtain some type of financial assurance to substitute for the $2 million coverage.

8. Pursuant to 35 Ill. Adm. Code 724.251, the Agency shall promulgate standardized forms based on 40 CFR 264.151 with such changes in wording as are necessary under Illinois law. Any owner or operator required to establish financial assurance under this Subpart shall do so only upon the standardized forms promulgated by the Agency. The Agency shall reject any financial assurance document which is not submitted on such standardized forms. The Agency has rejected your financial assurance document(s) for failure to use the Illinois standardized forms.

   The Agency has rejected your letter of credit and trust agreement for failure to use the Illinois standardized forms.

AAT:BW:bjh/1553k/15,18

Environmental Protection Agency
1701 S. First Street Maywood, IL. 60153

#859

312/345-9780

Refer to: 03163403 - Cook County - Chicago/Metal Finishing
ILD045700945

August 23, 1982

Metal Finishing Research Corp.
4025 S. Princeton Avenue
Chicago, Illinois 60609

Attn: Philip Vadeboncoeur

Dear Mr. Vadeboncoeur:

On June 2, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of the Metal Finishing Research Corp. The purpose of the inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection the following apparent violations were observed:

The owner/operator is required to develop and follow a written waste analysis plan pursuant to 35 Ill. Adm. Code 725.113(b). The owner/operator was not able to provide such plan at the time of the inspection.

Pursuant to 35 Ill. Adm. Code 725.115(b), the owner/operator must develop and follow a written schedule for inspection of all equipment and devices that are important to preventing, detecting or responding to environmental or human health hazards. At the time of the inspection, no such schedule was available.

Pursuant to 35 Ill. Adm. Code 725.116, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to each such individual. You are in apparent violation of 35 Ill. Adm. Code 725.116 for the following reasons: A training program had not been implemented at the facility.

Pursuant to 35 Ill. Adm. Code 725.212, the owner/operator must have a closure plan at the facility. The plan must include a description of how and when the facility will be partially closed, if applicable, and ultimately closed. The plan must address the steps needed to decontaminate facility equipment. Also required is an estimate of the maximum inventory of wastes in storage or treatment on site at any given time and a schedule for final closure including the anticipated date when wastes will no longer be required. The owner/operator must submit his closure plan to the Director at least 180 days before the date he expects to begin closure. You are in apparent violation of 35 Ill. Adm. Code 725.212 for the following reasons: A closure plan and cost estimate was not available at the time of the inspection.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the apparent violations described in this letter. Failure to correct these apparent violations may result in enforcement actions. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Brad Benning of my staff at the above number.

Sincerely,

Kenneth P. Bechely /cgs

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:BPB:prb

Enclosures: Inspection Report
Regulations

cc: Division File
Northern Region
U.S. E.P.A. - Region V

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

LPC FC055 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. _____
(11) (18)

_____ CO. - L.P.C. Region # _____ Date __/__/__
(20) (25)

_____ / _____ Letter Sent (Yes or No) ____
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No ( ) Time: From __:__ m Weather _____
Ground Water( ) Surface( ) Other( ) To __:__ m
Photos Taken: Yes ( ) No ( ) Interviewed _____ Inspector ____ ____
(27) (29)

Previous Inspection _____ Previous Correspondence _____ Site Open: Yes( ) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	( )	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other	( )	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)		_____ (30)		Board Order	( )
						Illegal (5)	( ) (31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED I S or D ____ (62)

GENERAL REMARKS: _____

INTERVIEW: _____

DIAGRAM:

03163403
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD045700945
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Metal Finishing Research Corp.

(B) Street: 4025 S. Princeton Ave

(C) City: Chicago (D) State: Ill. (E) Zip Code: 60609

(F) Phone: 312/373-0800 (G) County: Cook

(H) Operator: SAME

(I) Street:

(J) City: (K) State: (L) Zip Code

(M) Phone: (N) County:

(O) Owner: SAME

(P) Street:

(Q) City: (R) State: (S) Zip Code:

(T) Phone: (U) County:

(V) Date of Inspection: 6-2-82 (W) Time of Inspection (From) 2:00 pm (To) 4:30 pm

(X) Weather Conditions: 70°

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Philip L. VADEBONCOEUR	Vice-President	312/373-0800

(Z) Inspection Participants	Agency/Title	Telephone
BRAD Benning	IEPA/EPS II	312/345-9780

(AA) Preparer Information

Name	Agency/Title	Telephone
BRAD Benning	IEPA/EPS II	312/345-9780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J) ✓
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

✓ E. Chemical, Physical, and Biological Treatment (Q)

omit 10-17

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	✓	none accepted
2. Facility expansion?	—	—	✓	no expansion
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	✓	—	not documented.
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	✓	no off-site waste
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	security Alarm
2. Artificial or natural barrier around facility?	✓	—	—	Fence
3. Controlled entry?	✓	—	—	
4. Danger sign(s) at entrance?	✓	—	—	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	✓	—	Below ground
2. Records of operator error?	—	✓	—	treatment tank.
3. Records of discharges?	—	✓	—	

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	No routine inspection
5. Safety, emergency equipment?	---	✓	---	schedule.
6. Security devices?	---	✓	---	
7. Operating and structural devices?	---	✓	---	
8. Inspection log?	---	✓	---	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓	---	---	Not Documented.
2. Job descriptions?	✓	---	---	
3. Description of training?	---	✓	---	
4. Records of training?	---	✓	---	
5. Have facility personnel received required training by 5-19-81?	✓	---	---	
6. Do new personnel receive required training within six months?	✓	---	---	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	---	Fire Proof Room
2. No smoking signs?	✓	---	---	
3. Separation and protection from ignition sources?	✓	---	---	Cyanides separated from any reactive chemicals

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

		Yes	No	NI*	Remarks
(A)	Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	—	✓	—	
(B)	If required, does the facility have the following equipment:				
1.	Internal communications or alarm systems?	✓	—	—	P.A system.
2.	Telephone or 2-way radios at the scene of operations?	✓	—	—	Telephone.
3.	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓	—	—	Extinguishers Safety Air Packs. Clothing Emerg. lighting absorbent eye wash - showers

Indicate the volume of water and/or foam available for fire control:

Dry ~~chemical~~ Pipe Sprinkler System; City water supply.

(C)	Testing and Maintenance of Emergency Equipment:				
1.	Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓	—	—	Maintenance
2.	Is emergency equipment maintained in operable conditions?	✓	—	—	
(D)	Has owner or operator provided immediate access to internal alarms? (if needed)	✓	—	—	

*Not Inspected

		Yes	No	NI*	Remarks
(E)	Is there adequate aisle space for unobstructed movement?	✓			

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

		Yes	No	NI*	Remarks
(A)	Does the Contingency Plan contain the following information:				
1.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			
2.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓			
3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
4.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			
5.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	✓			

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	✓			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			✓	no emergencies

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?			✓	N/A
2. Are records of past shipments retained for 3 years?			✓	N/A
(B) Does the owner or operator meet requirements regarding manifest discrepancies?			✓	N/A

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?	✓	—	—	
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	✓	—	—	Treatment
c. The location and quantity of each hazardous waste within the facility?	—	—	✓	NO HAZ. WASTE Storage
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	—	—	✓	N/A
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓	—	—	
f. Reports detailing all incidents that required implementation of the Contingency Plan?	✓	—	—	
g. All closure and post closure costs as applicable? (Effective 5-19-81)	—	✓	—	Not documented.

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?		✓		Not documented
2. Has this plan been submitted to the Regional Administrator		✓		
3. Has closure begun?		✓		
4. Is closure estimate available by May 19, 1981?		✓		
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)			✓	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?				n/a
2. Are containers compatible with waste in them?				
3. Are containers stored closed?				
4. Are containers managed to prevent leaks?				
5. Are containers inspected weekly for leaks and defects?				
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)				

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	—	—	—	N/A
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	—	✓

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: Metal Finishing Research Corp

Date of Inspection: 6-2-82

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓	—	—	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	✓	—	—	level indicators

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?			✓	Continuous treatment
4. Are inspection procedures followed according to 265.403?	✓			monthly check of monitoring equip
5. Are the special requirements fulfilled for ignitable or reactive wastes?	✓			cyanides and acids treated in separate Tanks
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	✓			separated

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓			
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓			
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓			

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	✓			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	✓			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required certification?	✓			
8. Required signatures?	✓			
(C) Does the owner or operator submit exception reports when needed?	✓			

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	✓			
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	✓			
(C) If required, are placards available to transporters of hazardous waste?	✓			

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	✓			
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	✓			
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	✓			
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?			✓	N/A
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?			✓	
c. Do continuous feed systems have a waste-feed cutoff?			✓	
d. Are required daily and weekly inspections done?			✓	
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?			✓	
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)			✓	

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	✓			
(B) Has the generator submitted Annual Reports and Exception Reports as required?			✓	none required

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		✓		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				n/a
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	✓			

II. INTERNATIOINAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?			✓	N/A
B. Are signed completed manifest(s) on file?			✓	N/A

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?		✓		
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?		✓		

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

XI. REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Facility is a chemical blender, which manufactures products for the Heat Treating and Metal Finishing industry. Waste generated is from the washing out of these blending tanks. Two waste/water streams are treated on-site. 1) Chrome-acid waste at ~ 16,000gal/month and 2) Barium-Cyanide-alkali waste at ~ 12,000gal/month. Both waste streams are treated in a below ground tank (separate compartments).

REMARKS: The waste/water is then filtered, the water is recycled in the plant and the sludge is collected in 55gal drums, and transfered to a warehouse for storage prior to transportation, by own trucks to Chicago/CID. The sludge by analysis is non-hazardous, but is still defined as hazardous waste, until it is delisted by the generator. No operational problems were observed at the facility, RCRA violations consisted mostly of not documenting interim status standards.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

May 12, 1993

Mr. William W. Walen
Vice President
Metal Finishing Research Corporation
4025 South Princeton Avenue
Chicago, Illinois 60609

Re: Visual Site Inspection
Metal Finishing Research Corporation
Chicago, Illinois
ILD 045 700 945

Dear Mr. Walen:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

METAL FINISHING RESEARCH CORPORATION CHICAGO, ILLINOIS ILD 045 700 945

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 045 700 945
Date Prepared	:	March 11, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL7S
Prepared by	:	PRC Environmental Management, Inc. (Michael G. Duffin)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from the solid waste management units (SWMU) at the Metal Finishing Research Corporation (MFRC) facility in Chicago, Cook County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The MFRC facility manufactures liquid and powdered proprietary chemical blends used by the metal industry for heat treating and finishing. The facility generates and manages the following waste streams: nonhazardous rinse water and wastewater treatment system (WWTS) sludge (D007). The facility formerly blended alkaline powders containing cyanide salts. The facility also formerly treated rinse waters to remove cyanide. The operations that generated these cyanide-containing rinse waters were discontinued in May 1992.

MFRC has been the sole owner and operator of the facility since its construction in 1962. The facility occupies 1.2 acres in a mixed-use area and employs 13 people. In 1989, the office and warehouse buildings were constructed in an area owned by MFRC. MFRC had been leasing the property to an adjacent business who used the area for parking. MFRC is a wholly-owned subsidiary of the Heatbath Corporation. The facility is currently regulated as a hazardous waste treatment, storage, or disposal (TSD) facility. On September 28, 1988, MFRC applied for a Part A permit withdrawal. The request was denied by the Illinois Environment Protection Agency (IEPA). MFRC is currently preparing a closure plan for the Hazardous Waste Storage Area (SWMU 2). On November 8, 1992, IEPA revoked the facility's interim status; however, MFRC is still regulated as a TSD pending closure of the Hazardous Waste Storage Area (SWMU 2).

The PA/VSI identified the following two SWMUs at the facility:

Solid Waste Management Units

1. Wastewater Treatment System (WWTS)
2. Hazardous Waste Storage Area

No areas of concern were identified during the PA/VSI.

All wastes generated at the facility are managed indoors. Process wastewater is contained in a tile-lined drainage system. All concrete floors are epoxy sealed. MFRC does not store substances that contain solvents or volatile organic compounds (VOC) during its operations. The facility is located in an urbanized area that is mostly paved. Facility SWMUs have a low potential for release to ground water, surface water, air, and on-site soils.

The MFRC facility is located in a mixed-use area within 0.1 mile of residences. Facility access is controlled by locked doors and a 24-hour security alarm system.

The nearest surface water body, South Fork of the Chicago River, is 1.3 miles northwest of the facility. The South Fork of the Chicago River is used for industrial purposes and leads to the Chicago Sanitary and Ship Canal, which flows southwest and is also used for industrial purposes.

Ground water is not used as a drinking water source in the area. Sensitive environments are not located on site. The nearest sensitive environment is an open water area in Sherman Park located 2.0 miles southwest of the facility. The facility has had no documented releases to the environment.

PRC recommends no further action at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Metal Finishing Research Corporation (MFRC) facility (EPA Identification No. ILD 045 700 945) in Chicago, Cook County, Illinois. The PA was completed on January 6, 1993. PRC gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA), National Oceanic and Atmospheric Administration (NOAA), Illinois State Geological Survey (ISGS), U.S. Geological Survey (USGS), U.S. Department of Commerce (USDC), Federal Emergency Management Agency (FEMA), Gale Research Company, Chicago Department of Planning and Development, Metropolitan Water Reclamation District of Greater Chicago (MWRDGC), and from EPA Region 5 RCRA files. The VSI was conducted on January 14, 1993. It included interviews with facility

representatives and a walk-through inspection of the facility. PRC identified two SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and five inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The MFRC facility is located at 4025 South Princeton Avenue in Chicago, Cook County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°49'01" N and longitude 87°38'00" W).

The facility is bordered on the north and east by Chicago International/Chicago Inc.; on the west by Jernberg Forging Company; and on the south by a residential area.

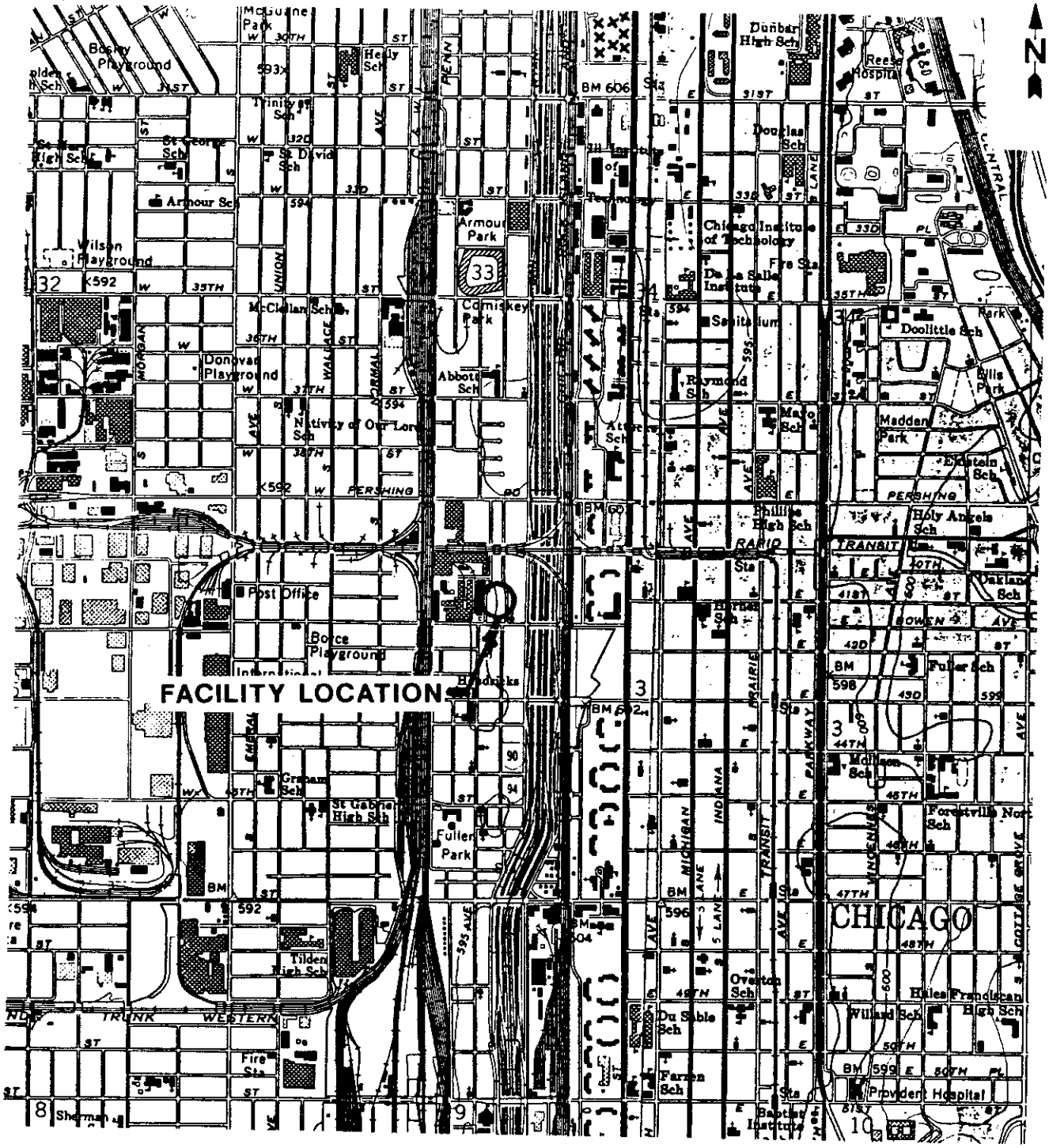
2.2 FACILITY OPERATIONS

MFRC, a wholly-owned subsidiary of Heatbath Corporation, is a chemical blending operation that manufactures products used by the metal finishing industry during heat treating and metal finishing operations. Wastewater streams are generated when the acidic liquid blending tanks and alkaline powder blending tanks are washed and when wastewater from the wet scrubbers in the powder blending area are drained. Wastewater is treated in the Wastewater Treatment System (SWMU 1).

Raw materials used to manufacture finished goods include various salts, acids, and alkalis. Raw materials are stored in 50-to 100-pound bags and in 55-gallon steel and plastic drums. These bags and drums are stored in a warehouse that adjoins the production area. Sulfuric, nitric, phosphoric, and hydrochloric acids are stored in aboveground storage tanks. Finished products are stored in the warehouse in 55-gallon steel and plastic drums, in other drums of various sizes, or in returnable 360-gallon tote bins.

The facility has manufactured metal finishing and heat treating proprietary products since its construction in 1962. The facility employs 13 people. In the past, alkaline powders and cyanide salts were blended at the facility. This line of products was discontinued in May 1992. The facility treated rinse water contaminated with cyanide through August 1992.

The facility is comprised of two buildings each approximately 26,000 square feet. The building to the north, the production building, was constructed in 1962. The eastern half of this



SOURCE: MODIFIED FROM USGS, ENGLEWOOD AND JACKSON PARK QUADRANGLES, 1980

METAL FINISHING RESEARCH CORPORATION
CHICAGO, ILLINOIS

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

building is used to store finished products and raw materials. The liquid blending room, powder blending room, and the wastewater treatment area are located in the western half of the production building. The Hazardous Waste Storage Area (SWMU 2) is in the southeastern part of the building and is approximately 10 feet by 35 feet. A corridor connects the production facility to a warehouse of approximately 26,000 square feet. The warehouse, built in 1989, stores raw materials and finished goods. The land underlying the warehouse was leased by MFRC to an adjacent business.

2.3 WASTE GENERATION AND MANAGEMENT

Wastes are generated and managed at various locations at the facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

The waste streams generated at the facility include nonhazardous rinse water and WWTS sludge (D007). Rinse water may contain chromium, depending on the product MFRC is blending. Rinse waters are generated when chemical blending tanks in the liquid acid blending room and powder blending room are washed and when the wet scrubbers in the powder blending room are drained. Wastewater treatment sludge (D007) is generated during the treatment of rinse water.

An average of 19,300 gallons of rinse water is treated per month. Rinse waters are gravity fed through a floor drainage system to the WWTS (SWMU 1). Treatment consists of pH neutralization and metal hydroxide precipitation. This treatment generates WWTS sludge (D007). The sludge is filtered, dried, and placed in a 55-gallon steel drum at the point of generation. When full, the drum is transferred to the Hazardous Waste Storage Area (SWMU 2), and the sludge is emptied into a 1-cubic-yard Chemical Waste Management chemical (chem) pack. The average volume of sludge generated is three 1-cubic-yard chem packs per month. Van Waters and Rogers, Inc. (VW&R), transports the sludge to the Laidlaw Environmental Services, Inc. (Laidlaw), hazardous waste landfill in Pinewood, South Carolina. The filtrate, approximately 19,100 gallons per month, is discharged to Metropolitan Water Reclamation District of Greater Chicago (MWRDGC).

The facility formerly blended alkaline powders and cyanide salts. Rinse water, generated when the blending tanks were washed out, underwent cyanide destruction, pH neutralization, and heavy metal precipitation. The resulting WWTS sludge (D007) was placed in 55-gallon steel

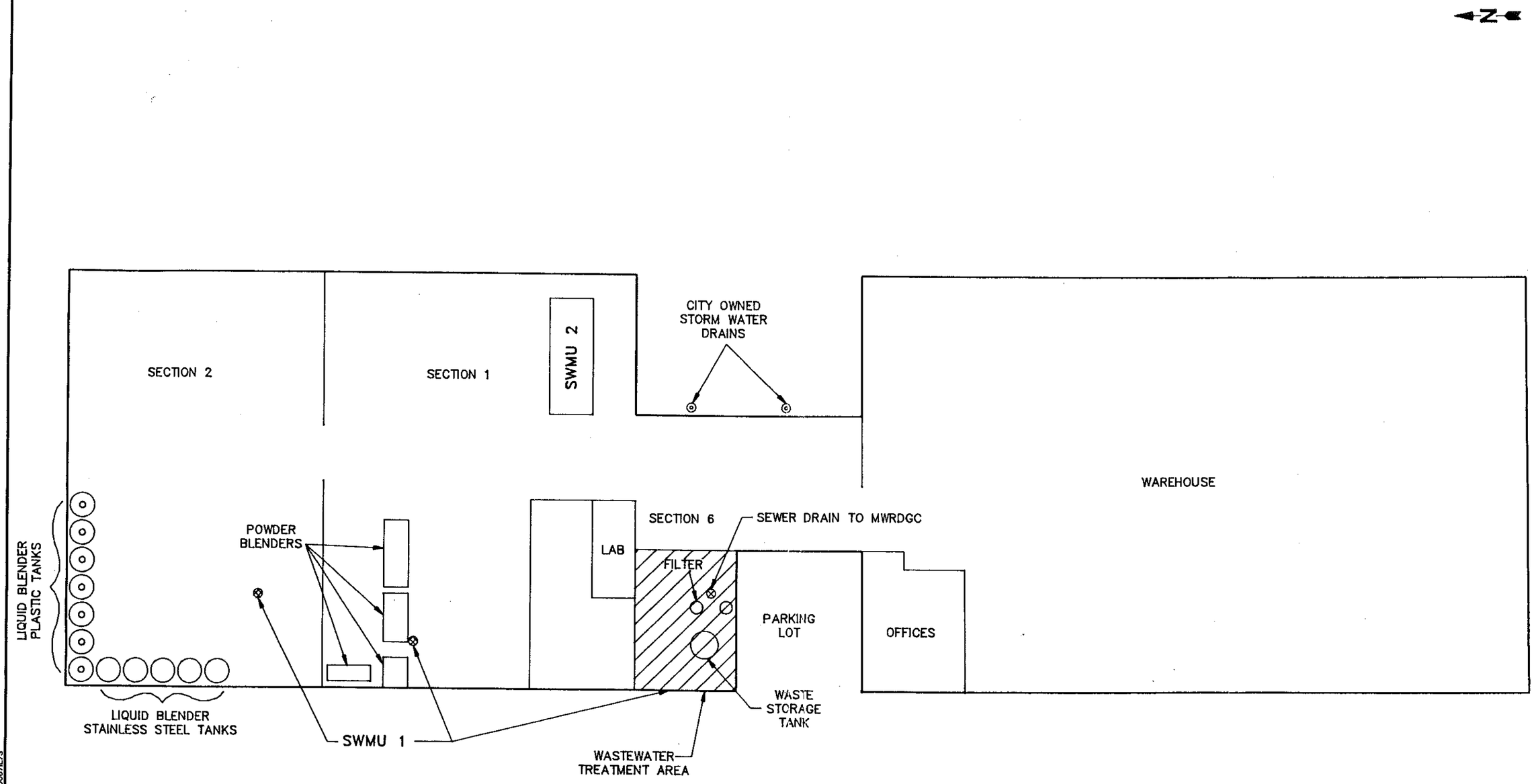
TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Wastewater Treatment System (WWTS)	No	Active; less than 90-day storage and treatment of hazardous waste
2	Hazardous Waste Storage Area	Yes	Active; greater than 90-day storage of hazardous waste

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



LEGEND

SWMU 1	WASTEWATER TREATMENT SYSTEM
SWMU 2	HAZARDOUS WASTE STORAGE AREA
⊗	SEWER DRAINS TO WASTEWATER TREATMENT SYSTEM

NOT TO SCALE

SOURCE: MODIFIED FROM MFRC SKETCH RECEIVED BY PRC ON JANUARY 14, 1993

METAL FINISHING RESEARCH CORPORATION
CHICAGO, ILLINOIS

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

J/93 - CFR - 009-C05087L7S
METALRES.DWG -

TABLE 2
SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Rinse water/NA	Powder and liquid blending tank washdowns, wet scrubber drainage	SWMU 1
WWTS Sludge/D007	Rinse water treatment	SWMU 2

Note:

[a] Not applicable (NA) designates nonhazardous waste.

drums at the point of generation and transferred to the Hazardous Waste Storage Area (SWMU 2) for storage. In May 1992, the facility discontinued manufacturing cyanide salt-formulated products. Until August 1992, MFRC continued to treat powder room rinse water to destroy residual cyanide remaining in the system. The resulting WWTS sludge (D007) was placed in 55-gallon steel drums and transferred to the Hazardous Waste Storage Area (SWMU 2) for storage.

2.4 HISTORY OF DOCUMENTED RELEASES

The facility has no history of documented releases.

2.5 REGULATORY HISTORY

On August 4, 1980, MFRC submitted a Notification of Hazardous Waste Activity form to EPA (MFRC, 1980a). On November 17, 1980, MFRC submitted a RCRA Part A permit application. The Part A permit application included a container storage area with a capacity of 55 gallons per day; referring to the Hazardous Waste Storage Area (SWMU 2). The following waste codes were listed on the Part A permit application: sodium cyanide (P106), ignitables (D001), corrosive wastewater (D002), chromium (D007), and barium (D005) (MFRC, 1980b).

There is no documentation in IEPA, EPA, or facility files that ignitable waste (D001) was ever generated or managed at the facility. Facility representatives stated that corrosive wastewater (D002) was filed protectively. Rinse waters and sludges have never been analyzed for barium (D005) and manifests indicate that all WWTS sludge has been assigned the D007 waste code. There is no documentation concerning the disposal of sodium cyanide or containers with sodium cyanide residue (P106).

IEPA inspected the facility on three occasions between 1982 and 1989 (IEPA, 1982; 1986; 1989a). These inspections revealed violations concerning waste analysis plans, personnel training plans, closure and post-closure plans, and other paperwork. All violations and notices of noncompliance have been resolved and are noted in IEPA files (IEPA, 1991).

The facility is currently regulated as a generator of hazardous waste and a treatment, storage, or disposal (TSD) facility. Manifests indicate that hazardous waste (D007) has been stored for greater than 90 days. On November 8, 1992, the facility's interim status was revoked by IEPA (IEPA, 1989b), thus requiring MFRC to initiate closure of the Hazardous Waste Storage Area (SWMU 2).

On August 19, 1991 MFRC submitted a closure plan for the Hazardous Waste Storage Area (SWMU 2). The plan was not approved for various paperwork deficiencies. MFRC is currently addressing the deficiencies and preparing a new plan.

RCRA files reveal contradicting letters by IEPA personnel on whether MFRC should be regulated as a generator only or a TSD facility. On September 28, 1988, MFRC submitted a Part A permit application withdrawal request, asking that the facility's status be changed from a TSD to a generator (MFRC, 1988). This request was denied because manifests indicated that waste shipments occurred more than 90 days after the previous shipment was sent off site; therefore, until MFRC closes the RCRA-regulated Hazardous Waste Storage Area (SWMU 2), the facility will remain regulated as a TSD (EPA, 1993).

MFRC is not required to have air permits. MFRC discharges filtrate from the WWTS (SWMU 1) directly to a combined sewer of the MWRDGC. There is no permit required for this release.

The facility has never used underground storage tanks. PRC did not observe any documents indicating CERCLA activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Cook County is continental, with cold winters and warm summers. The average daily temperature is 49 degrees Fahrenheit (°F). The lowest average daily temperature is 21.1 °F in January. The highest average daily temperature is 83.6 °F in July (Gale, 1978).

The total annual precipitation for the county is 35.12 inches (NOAA, 1991). The median annual precipitation for the county is 34 inches (NOAA, 1991; USDC, 1968). The mean annual lake evaporation is 29.5 inches (USDC, 1968). The average snowfall from November to April is 37 inches. The 1-year, 24-hour maximum rainfall recorded in the area is 6.24 inches (Gale, 1978).

The prevailing wind is from the west-southwest. Average wind speed in highest in March at 11.8 miles per hour from the west (USDC, 1968).

2.6.2 Flood Plain and Surface Water

MFRC is not located in a 100-year flood plain (FEMA, 1992). The topography in the vicinity of the site exhibits low relief with a gentle slope to the southeast. The nearest bodies of water are the South Fork of the Chicago River, which lies 1.3 miles to the northwest of the facility and Lake Michigan which lies 2 miles to the east of the facility. The South Fork is used for industrial purposes and leads to the Chicago Sanitary and Ship Canal, which flows southwestward and is also used for industrial purposes (USGS, 1980).

Natural drainage in the vicinity of the facility has been altered by roadways, structures, and other features. Surface water runoff from the facility flows into storm sewers, which are located at each side of the loading docks on the east side of the facility. These sewers discharge to the Chicago Sanitary and Ship Canal through the combined sanitary and MWRDGC sewer. Permits are not required for storm water runoff discharge to the combined sewer system.

2.6.3 Geology and Soils

Facility-specific geology information was not available; therefore, regional information is presented. The MFRC facility is located on Lake Plain deposits from glacial Lake Chicago (present Lake Michigan). The Lake Plain deposits are a member of the Wadsworth Till of the Wedron Formation of the Pleistocene Epoch. The Wadsworth Till was deposited during the Wisconsinan glacial stage between approximately 12,500 and 22,000 radiocarbon years before present (BP) (ISGS, 1971).

The Wadsworth Till is a gray till interbedded with sorted sediments and composed primarily of sheet-like deposits of silt and clay-sized products separated by beds of sand and gravel. The thickness of the unconsolidated deposits in the vicinity of the facility is approximately 50 feet (ISGS, 1971).

The unconsolidated sediments in the region unconformably overlie Silurian-age bedrock. The uppermost bedrock unit is dolomite or dolomitic limestone of the Niagarian and Alexandrian Formation. The Silurian-age formations were typically formed as reef deposits built while Illinois lay under a shallow sea between 400 and 435 million years BP. The thickness of the Silurian-age formation in the vicinity of the facility is approximately 200 to 250 feet (ISGS, 1971).

In the vicinity of the facility, underlying the Silurian bedrock units is the 200-foot-thick Maquoketa Shale Group, deposited during the Ordovician period. The Maquoketa Shale Group is composed of several individual shale formations and a limestone formation deposited approximately 435 to 600 million years BP (ISGS, 1971).

The older Ordovician and Cambrian bedrock units beneath the Maquoketa Shale Group are composed primarily of limestone and sandstone and are typically in excess of 2,000 feet thick (ISGS, 1971).

2.6.4 Ground Water

The till layer of the Wadsworth Till generally does not provide sufficient yields to be utilized as a drinking water source because of its low permeability. The localized interbedded sand, silt, and gravel deposits can yield moderate quantities of ground water. Recharge to the till and associated localized sand, silt, and gravel units typically occurs locally from precipitation (ISGS, 1955).

The bedrock unit below the unconsolidated material in northern Illinois is an important aquifer; however, ground water from the aquifer is not used as a drinking water source in Chicago because of the availability of water from Lake Michigan. Ground water in the Niagarian and Alexandrian aquifers ranging from 50 to 400 feet below ground surface (bgs) is primarily obtained from joints, fissures, and solution cavities. The water-bearing openings are irregularly distributed both vertically and horizontally in the units (ISGS, 1955).

Beneath the confining Maquoketa Shale Group are high yielding Ordovician- and Cambrian-age Galesville, Mt. Simon Sandstone, and Eau Claire and Franconia Formations. These units are frequently used aquifers in northeastern Illinois. The Galesville sandstone ranges in depth from 1000- to 1800-feet in Cook County and at one time most municipal and major industrial water supplies were obtained from this aquifer (ISGS 1955).

2.7 RECEPTORS

MFRC occupies 1.2 acres in an industrial and residential area in Chicago, Cook County, Illinois. Chicago has a population of about 3 million people. MFRC employs 13 people. The facility is bordered on the north and east by Chicago International/Chicago, Inc.; on the west by Jernberg Forging Company; and on the south by several single family residences.

The nearest residential area is located about 0.1 mile south of the facility. The facility is equipped with double-locked door entrances and a 24-hour security alarm system.

The nearest surface water body, the South Fork Chicago River, is located 1.3 miles northwest of the facility and is used for industrial purposes. Other surface water bodies in the area include Lake Michigan, 1.8 miles east; ponds in Sherman Park 2.0 miles southwest, Washington Park, 2.2 miles southwest; and McKinley Park, 2.4 miles west-northwest of the facility.

Ground water is not used as a drinking water source in Chicago because of the availability of water from Lake Michigan.

Sensitive environments are not located on site. The nearest sensitive environment, a wetland, is located 2.0 miles southwest. This area is an excavated open water area located in Sherman Park.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1	**Wastewater Treatment System**
Unit Description:	The WWTS consists of a sewer system with a drain in the acid liquid blending room and the powder blending room. This sewer system vents to two holding tanks in the wastewater treatment area. The wastewater treatment area is approximately 30-by 60-feet. The WWTS consists of two approximately 900-gallon holding tanks, two approximately 1,100-gallon treatment tanks, one 2,600-gallon settling tank, and one filter press. The holding and treatment tanks are constructed of lined concrete and are inground. The system treats an average of 19,300 gallons of rinse water per month. A 55-gallon drum is filled with dried hazardous waste sludge (D007), which is a product of the WWTS.
Date of Startup:	The unit began operation in 1973. Wastewater treatment practices by the facility from 1962 to 1973 are unknown.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous drainage rinse water generated when acidic liquid blending tanks and alkaline powder blending tanks are washed and when powder room wet scrubbers are drained. MFRC treats the rinse water in batches, generating WWTS sludge. This unit formerly managed nonhazardous rinse water generated by manufacturing powdered products formulated with cyanide salts. Rinse water from the powder blending room was treated to destroy cyanide using sodium hypochlorite. In May 1992, MFRC discontinued manufacturing cyanide salt-containing products. Until

August 1992, MFRC continued to treat powder room rinse water for cyanide to destroy residuals that may have been in the system.

Release Controls: This unit's drainage system has a corrosive-resistant tile lining. Holding and treatment tanks are constructed of lined concrete without secondary containment. Floor drains direct spills to the WWTS. All concrete is epoxy-sealed. The unit is located indoors and is equipped with high-level alarms.

History of Documented Releases: There is no history of documented releases from this unit.

Observations: During the VSI, the unit was treating rinse water. PRC observed a 4-foot-radius stained area around the drain in the acid liquid blending room; however, the concrete was not pitted or cracked. PRC observed that the area around the drain in the powder blending room was stained; however, the concrete was not pitted or cracked. No evidence of spills or overflows was observed around the holding and treatment tanks (see Photographs No. 1, 2, 3, and 4).

SWMU 2 **Hazardous Waste Storage Area**

Unit Description: The Hazardous Waste Storage Area is an indoor, 10-foot by 35-foot, epoxy-sealed concrete pad located in the southeastern quarter of the production facility. Yellow paint clearly marks its boundaries and "Hazardous Waste Storage Area" is clearly printed in the yellow paint. There are no floor drains in this unit. The nearest floor drain is 50 feet away. This drain leads to the WWTS.

Date of Startup: This unit began operation about 1973. Storage practices of the facility from 1962 to 1973 are unknown.

Date of Closure: This unit is active.

Wastes Managed: This unit manages hazardous dried WWTS sludge (D007) generated by the WWTS (SWMU 1). The sludge is stored in 1-cubic-yard chem packs until it is picked up for disposal by Van Waters and

	Rogers and landfilled in Laidlaw's South Carolina Pinewood Hazardous Waste landfill.
Release Controls:	This unit is an epoxy-sealed concrete pad located indoors. It manages dried WWTS sludge (D007). There are no berms, dikes, or drains in the area.
History of Documented Release:	No releases from this unit have been documented.
Observations:	During the VSI, the unit contained one full steel-strapped chem pack and one partially full chem pack (see Photograph No. 5).

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs and no AOCs at the MFRC facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 **Wastewater Treatment System**

Conclusions: The WWTS consists of a sewer system with a drain in the acid liquid blending room and the powder blending room. This sewer system vents to two holding tanks in the wastewater treatment area. The WWTS consists of two holding tanks, two treatment tanks, one settling tank, and one filter press. A 55-gallon drum is filled with dried hazardous WWTS sludge (D007), which is generated by the WWTS. The potential for release to environmental media is summarized below.

The potential for release to ground water, surface water, air, and on-site soils is low. Spills and leaks are contained in the WWTS sewer which is constructed of corrosive-resistant tile. Tanks are lined concrete and all concrete floors are epoxy sealed. The nearest surface water is 1.3 miles northwest of the facility. Particulates and airborne dust in the powder blending room are exhausted and directed to wet scrubbers. The facility does not use any solvents or products containing VOCs during its operation.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 2 **Hazardous Waste Storage Area**

Conclusions: The Hazardous Waste Storage Area is located indoors on a 10-foot by 35-foot epoxy sealed concrete pad. Dried hazardous waste sludge (D007), generated by the WWTS, is stored in 1-cubic-yard chem packs before being transported by Van Waters and Rogers to Laidlaw's South Carolina

Pinewood Hazardous Waste landfill. The potential for release to environmental media is summarized below.

The potential for release to ground water, surface water, air, and on site soils is low. The waste is dried sludge and resistant to flow. The unit is located indoors on an epoxy-sealed concrete floor. The dried sludge contains no solvents or VOCs. The facility is located in an urbanized area that is almost entirely paved.

Recommendations: PRC recommends no further action for this SWMU at this time.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. WWTS	1973 to present	None	No further action
2. Hazardous Waste Storage Area	1973 to present	None	No further action

REFERENCES

Federal Emergency Management Agency (FEMA), 1992. Flood Insurance Rate Maps, Special Flood Hazard Areas.

Gale Research Company (Gale), 1978. Climates of the United States, Alabama - Montana, Volume 1.

Illinois Environmental Protection Agency (IEPA), 1982. Observation Report by Charles Gebien, IEPA/EPS, August 23.

IEPA, 1986. RCRA Inspection Report by Richard Finley IEPA/EPA, October 22.

IEPA, 1989a. IEPA Inspection Report by Mary Glynn, IEPA/EPA, July 27.

IEPA, 1989b. IEPA Letter to MFRC, June 20.

IEPA, 1991. IEPA Letter to Division file, June 10.

IEPA, 1991b. Notice of Disapproval of Closure Plan, August 19.

Illinois State Geological Survey (ISGS), 1955. Groundwater Possibilities in Northeastern Illinois, Circular 198.

ISGS, 1971. Summary of the Geology of the Chicago Area.

Metal Finishing Research Company (MFRC), 1980a. Notification of Hazardous Waste Activity Form, U.S. EPA Form 8700-IL, August 4.

MFRC, 1980b. Hazardous Waste Permit Application, U.S. EPA Form 3510-3, November 17.

MFRC, 1988. Facility Part A permit application Withdrawal Request Form, September 28.

National Oceanic and Atmospheric Administration (NOAA), 1991. Local Climatological Data: Annual Summary with Comparative Data for Chicago, O'Hare International Airport.

U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United Sates, U.S. Government Printing Office.

U.S. Environmental Protection Agency (EPA), 1993. Letter from George Hamper, EPA to Francene Harris, EPA, January 4.

U.S. Geological Survey (USGS), 1980. 7.5-Minute Topographic Series: Modified Englewood and Jackson Park Quadrangles, Illinois.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 045 700 945

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Metal Finishing Research Corporation	4025 South Princeton Avenue				
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Chicago	IL	60609	Cook		
09 COORDINATES: LATITUDE 41°49'01" N	LONGITUDE 87°38'00" W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
From Pershing Road, turn south onto Princeton Avenue. The facility is located two blocks south of the Princeton and Pershing Intersection.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Metal Finishing Research Corporation	4025 South Princeton Avenue		
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Chicago	IL	60609	(312) 373-0800
07 OPERATOR *(If known and different from owner)*	08 STREET *(Business, mailing, residential)*		
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP *(Check one)*
■ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
■ A. RCRA 3010 DATE RECEIVED: 8 /4 /80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
■ YES DATE 1-14-93 ☐ NO
BY *(Check all that apply)*
☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*
CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)

02 SITE STATUS *(Check one)*
■ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN

03 YEARS OF OPERATION
1962 (BEGINNING YEAR) Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Substances related to the manufacture of chemical blends, liquid and powdered, used in the heat treating and metal finishing industry, including acids, alkalies and products containing chromium.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
Residue on floor in the chemical blending rooms.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*
☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Michael Duffin		PRC	(414) 821-5894	02 / 04 / 93 (MONTH DAY YEAR)

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

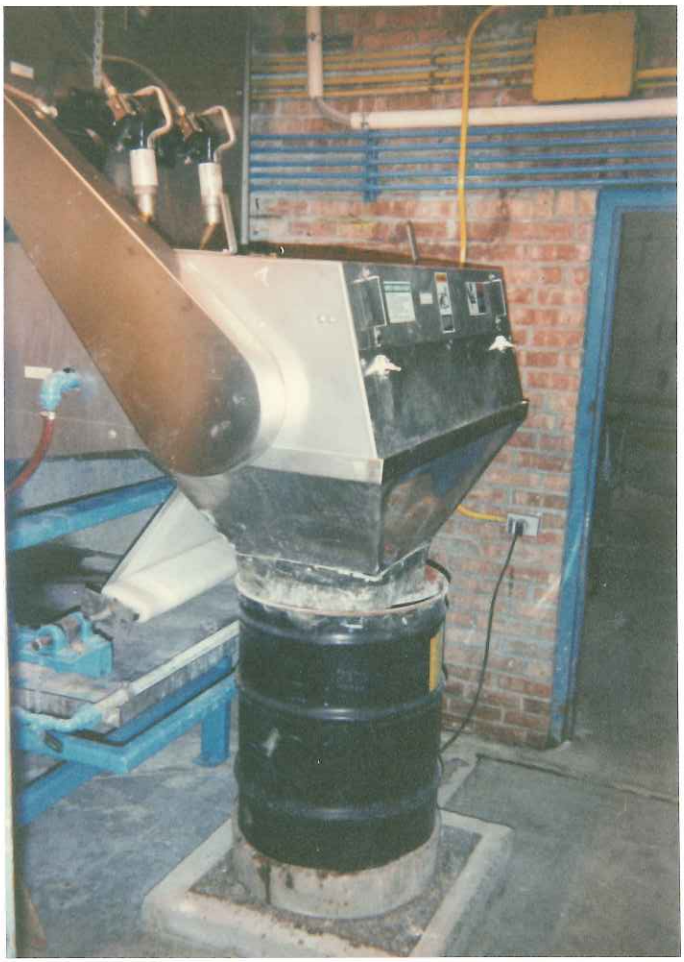
Metal Finishing Research Corporation
4025 South Princeton Avenue
Chicago, Illinois 60609
ILD 045 700 945

Date:	January 14, 1993
Primary Facility Representative:	Williams W. Walen, Vice President, Metal Finishing Research Corporation (MFRC)
Representative Telephone No.:	(312) 373-0800
Inspection Team:	Michael G. Duffin, PRC Environmental Management, Inc. (PRC) Scott Storlid, PRC
Photographer:	Scott Storlid, PRC
Weather Conditions:	Clear, calm; 15 °F, 4 to 6 inches of snow on the ground
Summary of Activities:	The visual site inspection (VSI) began at 9:52 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 10:46 a.m. The entire facility was inspected. Raw material and finished good storage areas were checked for leaking containers. None were observed. Liquid blending rooms and powder blending rooms were inspected and the Wastewater Treatment System (SWMU 1) was identified. Stains were observed around the drains in the chemical blending rooms. The Hazardous Waste Storage Area (SWMU 2) was identified and inspected. No sign of leakage was observed. Finally, the laboratory and the wastewater treatment areas were inspected. The construction and processes of the treatment unit were observed. The tour concluded at 11:15 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 11:29 a.m.

Photograph No. 1 Location: SWMU 1
Orientation: Southwest Date: 01/14/93
Description: This photograph shows the wastewater pipe leading to the drain in the liquid chemical blending room. The dark circle around the drain is from wastewater accumulation on the floor.

Photograph No. 2 Location: SWMU 1
Orientation: Southwest Date: 01/14/93
Description: This photograph shows the wastewater pipe leading to the drain in the powder blending room. The floor stains are from wastewater drainage. The drain is beneath the metal roll conveyor.

Photograph No. 3 Location: SWMU 1
Orientation: South Date: 01/14/93
Description: This photograph shows the top of the belowground treatment tanks in the wastewater treatment area. The tanks are located below the metal diamond plates.



Photograph No. 4 Location: SWMU 1
Orientation: Southwest Date: 01/14/93
Description: This photograph shows the filter press and the dried sludge being placed in a 55-gallon steel drum at the point of generation.

Photograph No. 5 Location: SWMU 2
Orientation: East Date: 01/14/93
Description: This photograph shows the Hazardous Waste Storage Area (SWMU 2). Not shown in the picture are one full chem pack and one partially full chem pack being managed in the area.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

1/14/93

HEATBATH - PARK METALLURGICAL CORPORATION

METAL FINISHING RESEARCH

CLEAR, CALM, 15°F

0952 ARRIVE ON SITE

MEET W/ WILLIAMS W. SAS WEALEN

BEGIN VSI MEETING

- MANUFACTURING FACILITY 26,000 ft² - EARLY 60's
- WAREHOUSE 26,000 ft² ≈ 1989
- WAS AN EMPTY LOT - FOR PARKING
- 13 EMPLOYEES
- BLEND PROPRIETARY PRODUCTS FOR METAL FINISHING AND HEAT-TREATING INDUSTRIES.
- POWDERED AND LIQUID PRODUCTS
- RAW MATERIALS - SALTS, OXIDES, Cu SULFATE, ACIDS, ALKALINES
- STORED IN BAGS, ABOVE GROUND TANKS, 55-GALLON DRUMS AST - 4 TOTAL
- PRODUCTION
  1) LIQUID BLENDING - TANKS PRODUCT DIRECTLY TO 55-GAL. DRUMS OR TOTES.
  TANK WASHING - WASTE PIPED DIRECTLY

TO WTS - WIDE ARRAY OF PRODUCT, SO UNSURE IF WASTEWATER IS HAZ - HAVENT ANALYZED THEM.

WTS - SINCE MID 60's
- TREATING WIDE VARIETY OF WASTE, DEPENDENT ON PRODUCTION
- CHROME REDUCTION, NUETRALIZATION, PH ADJUST, FLOC.
- IS 2 SYSTEMS - 1 FOR LIQUID, 1 FOR POWDER -
Eq. HAS 1 HOLDING TANK, PUMPED TO TREATMENT TANK, TREATED, PUMPED

TO SETTLING TANK, THEN FILTERED - EFFLUENT RELEASED MSD:
- SLUDGE - COLLECTED AT AT THE FILTER - AMOUNT VARIES - ≈ 2 3 DRUMS / WK.
D007
- VAN WATERS + ROGERS LANDFILLED @ HAZ. WASTE LANDFILL PINEWOOD, SC.
- NO PERMIT FOR EFFLUENT RELEASE w/ MSD - COMPLIANCE w/ CATEGORICAL STANDARDS
- HW STORAGE AREA - DOOR DRUM EMPTIES

TO A CHEM-PAK

3) POWDERED PROCESS
- DUST EXHAUSTED FROM MACHINES, THROUGH A WET SCRUBBER - PIPED TO WTS
- WASTEWATER FROM WASHDOWN TO WTS
- USED TO TREAT FOR CYANIDE IN DEVELOP OF WTS, BUT HAVE DISCONTINUED PRODUCING CYANIDE PRODUCTS - 6 mo AGO.
- SLUDGE INCLUDED W/ ABOVE

QC-LAB HAD ONETIME GENERATION OF OFFSPEC

PRODUCT - SMALL AMOUNT.
- OCCASIONALLY CLEAN DRUMS - WATER TO WTS
- FLOOR DRAINS IN THE FACILITY ARE SEALED - TWO DRAINS - 1 IN DRY ROOM, 1 IN POWDER ROOM DRAIN TO WTS
- HW STORAGE AREA ≈1960's
- LOWE ST. IS A WAREHOUSE W/ RAW MATERIALS + FINISHED GOODS - IT IS CURRENTLY FOR SALE. EMPTY DRUMS STORED

THERE - NO H.W. STORAG'
- TO HIS KNOWLEDGE, THERE NEVER WAS.

- OCCASIONALLY SEND OF OFF-SPEC, BAD BLEND MATERIALS - LAST TIME WAS ≈ JAN 1990, USUALLY NON-REGULATED -

1046 BEGIN VSI TOUR WAREHOUSE - FINISHED GOODS, RAW MATERIAL

1051 ENTER PRODUCTION BLDG. HW STORAGE AREA 35x10 FT CEMENT, NOT DIKED, 4 CHEM PACKS 1 DRUM TO BE

DUMPED INTO PAILS WHEN FULL (DOT)

1055 PIC 1 EAST - HW SA

- RAW MATERIAL STORAGE IN PRODUCTION BLDG.

WET ROOM - TANKS PIPES UNTO FLOOR NEAR DRAIN TO WTS

1059 PIC 2 - SW - DRAIN AND FLOOR AND PIPE MENTIONED ABOVE

1102 PIC 3 - SW - PIPE FROM WET SCRUBBER, DRAIN

TO POWER(DRY) SILO SAS
WTS BENEATH ROLLER.

1105 ENTER WTS

1107 SAS PIC 4 SOUTH LINED
CONCRETE HOLDING AND TREATMENT
TANKS BELOW PLATE
PART OF WTS -
METAL SETTLING TANK ABOVE

1109 PIC 5 SW - FILTER
PRESS & DOD7 DRUM
OF WTS

WTS - SEALED CONCRETE
FLOOR
- EFFLUENT 190,330 GAL
IN 1992.

1115 - END VSI - WRAP UP MEETIN
- CURRENTLY, NO STORAGE
FOR GREATER THAN
90-DAYS - HAVE
STORED FOR GREATER
THAN 90-DAYS BEFORE
1987.
- POSSIBLE THAT
G.T. 90-DAYS WAS
JUST (TIME BETWEEN SHIPMENTS -
WHEN THE 90 DAYS
SHOULD BEGIN WHEN
YOU HAVE A FULL DRUM.
- PLAN ON (RCRA CLOSING
THE HWSA - NOT
SURE WHEN.

1124 END INTERVIEW - LEAVE
FACILITY

D.A. Shuford

Date: January 13, 1993

To: Compliance file

From: Kevin M. Pierard

Subject: PA/VSI Metal Finishing Research Corp.
ILD 045 700 945

I instructed the EPA contractor (PRC) to proceed with the assessment of this facility. The attached certification indicates that the company stored hazardous waste on "a couple of occasions". In fact documents reviewed during the PA indicate that the company stored over 90 days on at least eleven occasions. Regardless of how many occasions waste was stored over 90 days the facility is subject to corrective action requirements due to the fact that they conducted storage of hazardous waste. This facility is not a protective filer.

METAL FINISHING RESEARCH CORP.

4025 S. PRINCETON AVE.
CHICAGO, ILLINOIS 60609

12/30/92

Mr. Kevin Pierard
c/o United States E.P.A.
Region 5
77 West Jackson Blvd.
Chicago, Il. 60604

Re: #HRE-8J
Visual Site Inspection
Metal Finishing Research Corp.
4025 S. Princeton Ave.
Chicago, Il. 60609
E.P.A. ID No. ILD 045 700 945

Dear Mr. Pierard,

As per my telephone conversation with you and Ken Valder of PRC about the need for a PA/VSI, please accept this letter as a certified statement that the location listed above was never a TSD of hazardous waste. The facility is a generator only. At this location Heat Treating and Metal Finishing products are made for industry. The hazardous waste results from washing the tanks and lines. Although the hazardous waste is shipped out every 90 days, there were a couple of occasions in the distant past that we regretfully went over 90 days. If you have any questions or require more information please contact me directly.

Sincerely,

Williams W. Walen

Treasurer

State of Illinois
County of Cook
Signed before me on 1-7-93
by Williams W. Walen

(seal)

OFFICIAL SEAL
MARY L MADDEN
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXP: 6/25/96

Mary L. Madden
signature of notary public

12/4/92

RECEIVED
WMD RCRA
RECORD CENTER

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 25, 1992

Bill Walen
Treasurer
Metal Finishing Research Corp.
4025 South Princeton Avenue
Chicago, Illinois 60609

Re: Visual Site Inspection
Metal Finishing Research Corp.
4025 Princeton Avenue
Chicago, Illinois
EPA ID No. ILD 045 700 945

Dear Mr. Walen:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for 9:00 a.m. on Thursday, December 10, 1992. The inspection team will consist of Tom Girman and Scott Brockway of PRC Environmental Management, Inc., a

contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francene M. Harris for

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Larry Eastep, IEPA

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU